

Janna Bullock - February 6, 2018

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

)
IN RE: APPLICATION OF GORSOAN LTD.) Civil Action No.
AND GAZPROMBANK) 17-cv-5912
)
-----)

DEPOSITION OF JANNA BULLOCK

February 6, 2018

10:40 a.m.

THE VIDEOTAPED EXAMINATION BEFORE TRIAL
of the Respondent, JANNA BULLOCK, taken by the
Petitioner, pursuant to a Subpoena, held at the
offices of FOLEY HOAG, LLP, 1540 Broadway, 23rd
Floor, New York, New York, 10036, before Avery N.
Armstrong, a Notary Public of the State of New
York.

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2 (Pages 2 to 5)

<p style="text-align: right;">Page 2</p> <p>1 2 A P P E A R A N C E S : 3 4 FOLEY HOAG, LLP 5 Attorneys for the Petitioner 6 GORSOAN LTD. and GAZPROMBANK OJSC 7 Seaport West 8 155 Seaport Boulevard 9 Boston, Massachusetts 02210 10 BY: CAROLINE S. DONOVAN, ESQ. 11 12 SHER TREMONTE, LLP 13 Attorneys for the Respondent 14 JANNA BULLOCK 15 90 Broad Street, 23rd Floor 16 New York, New York 10004 17 BY: MICHAEL TREMONTE, ESQ. 18 MARK CUCCARO, ESQ. 19 20 ALSO PRESENT: 21 STEVE DECANIO, Videographer 22 GregoryEdwards, LLC 23 24 25</p> <p style="text-align: center;">* * *</p>	<p style="text-align: right;">Page 4</p> <p>1 JANNA BULLOCK 2 THE VIDEOGRAPHER: Here 3 begins Media Unit Number 1, Volume 4 Number 1 in the video deposition 5 of Ms. Janna Bullock in the matter 6 of in re: Application of Gorsoan 7 Limited and Gazprombank OJSC 8 in the United States District 9 Court, the Southern District of 10 New York CA Action Number: 11 17-cv-5912. 12 Today's date is February 6, 13 2018. The time is approximately 14 10:41 a.m. 15 This deposition is being 16 taken as Foley Hoag, New York 17 office, 1540 Broadway, New York, 18 New York 10036. 19 My name is Steve DeCanio and 20 I'm the video legal specialist, 21 the court reporter is Avery 22 Armstrong, and we are both from 23 Gregory Edwards LLC. 24 Counsel, please identify 25 yourselves and state whom you</p>
<p style="text-align: right;">Page 3</p> <p>1 2 F E D E R A L S T I P U L A T I O N S 3 4 IT IS HEREBY STIPULATED AND AGREED by 5 and between the counsel for the respective parties 6 herein that the sealing, filing and certification 7 of the within deposition be waived; that the 8 original of the deposition may be signed and sworn 9 to by the witness before anyone authorized to 10 administer an oath, with the same effect as if 11 signed before a Judge of the Court; that an 12 unsigned copy of the deposition may be used with 13 the same force and effect as if signed by the 14 witness, 30 days after service of the original & 1 15 copy of same upon counsel for the witness. 16 17 IT IS FURTHER STIPULATED AND AGREED that 18 all objections except as to form, are reserved to 19 the time of trial. 20 21 * * * * 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 JANNA BULLOCK 2 represent, after which, the court 3 reporter will please swear in the 4 witness so we may begin. 5 MS. DONOVAN: Caroline 6 Donovan here on behalf of Gorsoan 7 and Gazprombank. 8 MR. CUCCARO: Mark Cuccaro, 9 Sher Tremonte, LLP, here on behalf 10 of the Respondent, Janna Bullock. 11 MR. TREMONTE: Michael 12 Tremonte, Sher Tremonte LLP, here 13 on behalf of the Respondent, Janna 14 Bullock. 15 J A N N A B U L L O C K, called as a witness, 16 having been first duly sworn by a Notary Public of 17 the State of New York, was examined and testified 18 as follows: 19 THE REPORTER: Please state 20 your name for the record. 21 THE WITNESS: Janna Bullock. 22 THE REPORTER: Please state 23 an address for the record. 24 THE WITNESS: [REDACTED] 25 [REDACTED] New York, New York [REDACTED]</p>

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3 (Pages 6 to 9)

Page 6	Page 8
<p>1 JANNA BULLOCK</p> <p>2 THE REPORTER: Is it an</p> <p>3 apartment or private home?</p> <p>4 THE WITNESS: It's an</p> <p>5 apartment.</p> <p>6 THE REPORTER: The apartment?</p> <p>7 THE WITNESS: [REDACTED]</p> <p>8 EXAMINATION BY</p> <p>9 MS. DONOVAN:</p> <p>10 MS. DONOVAN: I'll first put</p> <p>11 on the record, agreements between</p> <p>12 counsel. So we agree to waive all</p> <p>13 objections except as to form,</p> <p>14 Ms. Bullock and her counsel have</p> <p>15 30 days to read and sign the</p> <p>16 deposition transcript before a</p> <p>17 notary, and counsel for</p> <p>18 Ms. Bullock with designate</p> <p>19 pursuant to the party's protection</p> <p>20 orders which portions of that</p> <p>21 deposition transcript will be</p> <p>22 protected.</p> <p>23 Q. Now, Ms. Bullock you've</p> <p>24 stated your full name in response to</p> <p>25 the court reporter.</p>	<p>1 JANNA BULLOCK</p> <p>2 marked as Bullock Exhibit 1 for</p> <p>3 Identification.)</p> <p>4 Q. Ms. Bullock, I'm providing</p> <p>5 you what's been marked as Bullock</p> <p>6 Exhibit 1.</p> <p>7 Is that the subpoena to</p> <p>8 testify under which you're here today?</p> <p>9 I'll direct your attention to</p> <p>10 the part in the middle of the first</p> <p>11 page where it sets up today's</p> <p>12 deposition date and the offices of</p> <p>13 Foley Hoag.</p> <p>14 A. Yes.</p> <p>15 Q. Ms. Bullock, have you had</p> <p>16 your deposition taken previously?</p> <p>17 A. Yes.</p> <p>18 Q. I'll just recap with you some</p> <p>19 of the basic rules governing the</p> <p>20 deposition process. This will allow</p> <p>21 the court reporter and the videographer</p> <p>22 to obtain a clear transcript and a</p> <p>23 recording of what and I say.</p> <p>24 First, if we could agree to</p> <p>25 speak one at a time, it will allow for</p>
Page 7	Page 9
<p>1 JANNA BULLOCK</p> <p>2 Do you go by any other names?</p> <p>3 A. No.</p> <p>4 Q. Is Bullock your married name?</p> <p>5 A. I've never used my married</p> <p>6 name.</p> <p>7 Q. Okay. And what was your</p> <p>8 married name?</p> <p>9 A. That's my name, Janna</p> <p>10 Bullock.</p> <p>11 Q. And maiden name is Bullock?</p> <p>12 A. Maiden name was -- can I</p> <p>13 spell is it?</p> <p>14 Q. Yes.</p> <p>15 A. S-A-M-U-Y-L-I-K.</p> <p>16 Q. And your date of birth,</p> <p>17 Ms. Bullock.</p> <p>18 A. [REDACTED]</p> <p>19 Q. And Ms. Bullock, you're aware</p> <p>20 you've received a deposition subpoena</p> <p>21 to testify today?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Can we please mark as</p> <p>24 Exhibit 1, the subpoena to testify.</p> <p>25 (Whereupon, a subpoena was</p>	<p>1 JANNA BULLOCK</p> <p>2 a clear transcription.</p> <p>3 Will you agree to that?</p> <p>4 A. Yes.</p> <p>5 Q. If you don't understand a</p> <p>6 question that I ask, please say so.</p> <p>7 Otherwise, I will assume you understood</p> <p>8 the question asked.</p> <p>9 Do you agree?</p> <p>10 A. Yes.</p> <p>11 Q. Earlier, the court reporter</p> <p>12 swore you in.</p> <p>13 Do you understand that</p> <p>14 pursuant to that oath, you swore to</p> <p>15 provide truthful and accurate</p> <p>16 testimony?</p> <p>17 A. Yes.</p> <p>18 Q. And you understand that your</p> <p>19 testifying under the pains and</p> <p>20 penalties of perjury?</p> <p>21 A. Yes.</p> <p>22 Q. And by failing to provide</p> <p>23 truthful and accurate testimony, you</p> <p>24 could subject yourself to penalties?</p> <p>25 A. Yes.</p>

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4 (Pages 10 to 13)

Page 10

1 JANNA BULLOCK
 2 Q. Is there anything that would
 3 interfere with your ability to provide
 4 truthful and accurate testimony today?
 5 A. No.
 6 Q. Are you taking any
 7 medications that might interfere with
 8 your ability to provide truthful and
 9 accurate testimony?
 10 A. No.
 11 Q. Now, Ms. Bullock, you said
 12 you've been deposed previously.
 13 Do you recall the first time
 14 you were deposed?
 15 A. Yes.
 16 Q. Roughly, when was that?
 17 A. I don't recall.
 18 Q. Do you recall what the matter
 19 was, what the case concerned?
 20 A. That case concerned my former
 21 employer.
 22 Q. And who was that?
 23 A. Emanuel Zeltser.
 24 Q. Can you spell that last name?
 25 A. Z-E-L-T-S-E-R. His first

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1 JANNA BULLOCK
 2 Q. Over 30?
 3 A. No.
 4 Q. Did you provide testimony in
 5 court on that matter, so outside of the
 6 deposition conference room space?
 7 A. It was in a deposition.
 8 Q. Okay. Roughly, how many
 9 times have you been deposed,
 10 Ms. Bullock?
 11 A. Twice.
 12 Q. Twice. What was the other
 13 matter in which you were deposed?
 14 A. I was a plaintiff in a
 15 dispute with a party planner.
 16 Q. When did you bring that case
 17 as the plaintiff?
 18 A. Ten years ago. Around 10
 19 years ago.
 20 Q. What was the issue in that
 21 case?
 22 A. It was a dispute about my
 23 daughter's wedding.
 24 Q. Did you provide testimony in
 25 court in that matter?

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1 JANNA BULLOCK
 2 name is Emanuel.
 3 Q. Okay. Thank you. Was that
 4 case pending in New York?
 5 A. To the best of my knowledge.
 6 Q. Were you a defendant in that
 7 action?
 8 A. A witness.
 9 Q. A witness, okay.
 10 So you were not a party in
 11 that case?
 12 A. No.
 13 Q. And what was the issue?
 14 A. I don't remember.
 15 Q. About what topic did you
 16 provide testimony?
 17 A. About my former employer.
 18 Q. What in particular about your
 19 former employer?
 20 A. I don't remember. I don't
 21 remember details.
 22 Q. Was this over 10 years ago?
 23 A. Yes.
 24 Q. Over 20 years ago?
 25 A. Yes.

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1 JANNA BULLOCK
 2 A. No.
 3 Q. What was the resolution of
 4 that case?
 5 A. I don't know. I don't think
 6 it's over.
 7 Q. Did it go to trial?
 8 A. No.
 9 Q. Do you recall what court you
 10 brought that suit in?
 11 A. No.
 12 Q. Was it in New York?
 13 A. Yes.
 14 Q. When I say deposition, do you
 15 understand me to mean the space like
 16 one we're in today where a reporter is
 17 present who takes down your answers to
 18 a lawyer's questions?
 19 A. Yes.
 20 Q. Okay. And you've only been
 21 deposed two times?
 22 A. Yes.
 23 Q. How many times have you
 24 testified in court?
 25 A. None.

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5 (Pages 14 to 17)

Page 14	Page 16
<p>1 JANNA BULLOCK</p> <p>2 Q. You've been a party to other</p> <p>3 cases; is that correct?</p> <p>4 A. (Nonverbal gesture).</p> <p>5 Q. You're going to need to give</p> <p>6 verbal answers for the court reporter.</p> <p>7 A. Yes.</p> <p>8 Q. Now, in other instances, have</p> <p>9 you been the plaintiff, the person who</p> <p>10 brought the suit?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. What were those other</p> <p>13 instances?</p> <p>14 A. They were business disputes.</p> <p>15 Q. Roughly, how many times have</p> <p>16 you been a plaintiff in a lawsuit?</p> <p>17 A. I don't know.</p> <p>18 Q. More than 10 times?</p> <p>19 A. No.</p> <p>20 Q. More than five?</p> <p>21 A. No.</p> <p>22 Q. Okay. And when you say,</p> <p>23 "business disputes," to what are you</p> <p>24 referring?</p> <p>25 A. Architectural matters.</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. Was your deposition taken in</p> <p>3 that matter?</p> <p>4 A. No.</p> <p>5 Q. Was your deposition taken in</p> <p>6 your original suit against Alhadeff?</p> <p>7 So not the counter claim.</p> <p>8 A. No.</p> <p>9 Q. What was the resolution of</p> <p>10 the suit with Alhadeff?</p> <p>11 A. I think it's still pending.</p> <p>12 Q. Did it go to court?</p> <p>13 A. No.</p> <p>14 Q. Was it settled?</p> <p>15 A. Maybe.</p> <p>16 Q. What do you mean by still</p> <p>17 pending?</p> <p>18 A. It wasn't significant issues,</p> <p>19 so I don't really follow it. I just --</p> <p>20 I kind of didn't focus on it.</p> <p>21 Q. So when you say, not</p> <p>22 significant issues, what do you mean?</p> <p>23 A. There were emotional issues</p> <p>24 about this architect.</p> <p>25 Q. What were the emotional</p>
Page 15	Page 17
<p>1 JANNA BULLOCK</p> <p>2 Q. Any other types of disputes</p> <p>3 in which you've been the plaintiff?</p> <p>4 A. I don't recall.</p> <p>5 Q. Now, Ms. Bullock, you've been</p> <p>6 the defendant in other cases; is that</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. Roughly, how many times have</p> <p>10 you been the defendant in a case?</p> <p>11 A. Maybe twice.</p> <p>12 Q. Do you recall what those</p> <p>13 matters concerned?</p> <p>14 A. Probably the same thing.</p> <p>15 Q. So isolate the first time you</p> <p>16 were a defendant.</p> <p>17 Who sued you?</p> <p>18 A. It was a counter-claim. It</p> <p>19 was an architect.</p> <p>20 Q. An architect sued you?</p> <p>21 A. It was a counter-claim. I</p> <p>22 sued him and he sued me.</p> <p>23 Q. What was that architect's</p> <p>24 name?</p> <p>25 A. Giancarlo Alhadeff.</p>	<p>1 JANNA BULLOCK</p> <p>2 issues?</p> <p>3 A. He was a con artist.</p> <p>4 Q. What was the sum of money</p> <p>5 that was in dispute?</p> <p>6 A. That based on a false</p> <p>7 statements, he collected over a million</p> <p>8 Euros of his fees in France based on a</p> <p>9 claim that he built a tent over a</p> <p>10 five-story structure that had no access</p> <p>11 to it.</p> <p>12 Q. So you were suing him for</p> <p>13 1 million Euros?</p> <p>14 A. I don't remember the amount,</p> <p>15 but I was suing him out of devastation</p> <p>16 of his unprofessional and just</p> <p>17 behavior.</p> <p>18 Q. You were suing him because</p> <p>19 you were upset over the</p> <p>20 unprofessionalism?</p> <p>21 MR. TREMONTE: Objection.</p> <p>22 MS. DONOVAN: You can answer.</p> <p>23 A. Of his cruelty and</p> <p>24 dishonesty.</p> <p>25 Q. Why were you suing</p>

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6 (Pages 18 to 21)

Page 18	Page 20
<p>1 JANNA BULLOCK</p> <p>2 Mr. Alhadeff?</p> <p>3 MR. TREMONTE: Objection.</p> <p>4 MS. DONOVAN: You can answer.</p> <p>5 A. I was suing Mr. Alhadeff</p> <p>6 because he collected money based on</p> <p>7 nothing.</p> <p>8 Q. And you were upset because he</p> <p>9 was dishonest and unprofessional?</p> <p>10 MR. TREMONTE: Objection.</p> <p>11 Asked and answered.</p> <p>12 MS. DONOVAN: You can answer.</p> <p>13 A. When architect earns a</p> <p>14 million dollars fee, he needs to build</p> <p>15 a building.</p> <p>16 Q. Now, the other instance in</p> <p>17 which you were a defendant, when did</p> <p>18 that occur?</p> <p>19 A. I don't remember.</p> <p>20 Q. Who sued you in that case?</p> <p>21 A. I don't remember.</p> <p>22 Q. Was it another professional</p> <p>23 dispute?</p> <p>24 MR. TREMONTE: Objection.</p> <p>25 A. I don't remember.</p>	<p>1 JANNA BULLOCK</p> <p>2 divulge anything that's privileged</p> <p>3 with your lawyers.</p> <p>4 So that will be an instance</p> <p>5 when your lawyer will object.</p> <p>6 So -- and you shouldn't answer</p> <p>7 that question.</p> <p>8 THE WITNESS: Okay.</p> <p>9 Q. Now, Ms. Bullock, you've</p> <p>10 testified that you've never given</p> <p>11 testimony in court; is that correct?</p> <p>12 A. To the best of my knowledge.</p> <p>13 Q. In answering my previous</p> <p>14 questions about instances where you</p> <p>15 were a party to a lawsuit, were you</p> <p>16 referring to civil cases?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Have you ever been</p> <p>19 charged with a criminal -- in a</p> <p>20 criminal matter?</p> <p>21 A. No.</p> <p>22 Q. You've never been -- excuse</p> <p>23 me. Strike that.</p> <p>24 Have you ever been charged</p> <p>25 with a crime in the United States?</p>
Page 19	Page 21
<p>1 JANNA BULLOCK</p> <p>2 Q. Do you recall anything at all</p> <p>3 about the other instance in which you</p> <p>4 were sued as a defendant?</p> <p>5 A. No.</p> <p>6 Q. How do you know that you were</p> <p>7 sued two times then?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 MS. DONOVAN: You can answer.</p> <p>10 A. I don't know.</p> <p>11 MR. TREMONTE: By the way,</p> <p>12 counsel keeps reminding you that</p> <p>13 you can answer.</p> <p>14 Just so the record is clear,</p> <p>15 I will mark, may makes an</p> <p>16 objection to the form of a</p> <p>17 question.</p> <p>18 That's what we agreed to</p> <p>19 initially, and it's always the</p> <p>20 case that you can answer, unless</p> <p>21 it's for some reason we instruct</p> <p>22 you not to, okay?</p> <p>23 THE WITNESS: Mm hm.</p> <p>24 MS. DONOVAN: That's correct.</p> <p>25 And I won't be asking you to</p>	<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. Have you ever been charged</p> <p>4 with a crime in Europe?</p> <p>5 A. No.</p> <p>6 Q. Have you ever been charged</p> <p>7 with a crime in Russia?</p> <p>8 A. That's what I heard recently.</p> <p>9 Q. What have you heard recently?</p> <p>10 A. That I was tried.</p> <p>11 MR. TREMONTE: Objection.</p> <p>12 I'm just going to caution you</p> <p>13 to the extent that you had a</p> <p>14 communication with a lawyer that</p> <p>15 represents you about legal matters</p> <p>16 in Russia, those communications,</p> <p>17 to the extent that they're for the</p> <p>18 purpose of seeking legal advice</p> <p>19 are privileged.</p> <p>20 So I caution you not to</p> <p>21 answer as to the content of the</p> <p>22 communications with a lawyer.</p> <p>23 A. There was no communication</p> <p>24 with lawyer about that.</p> <p>25 Q. So what did you understand to</p>

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7 (Pages 22 to 25)

<p style="text-align: right;">Page 22</p> <p>1 JANNA BULLOCK</p> <p>2 be the matter in Russia that is</p> <p>3 currently pending?</p> <p>4 A. It's -- I've been accused of</p> <p>5 doing inappropriate things that I've</p> <p>6 never done, or never heard of.</p> <p>7 Q. And has there been are</p> <p>8 resolution or conviction in the case in</p> <p>9 Russia?</p> <p>10 A. I do not know. I just hired</p> <p>11 an attorney.</p> <p>12 Q. Don't tell me what the</p> <p>13 attorney told you.</p> <p>14 But do you understand that</p> <p>15 there has been a conviction in the case</p> <p>16 in Russia?</p> <p>17 A. My understanding is there is</p> <p>18 a case in Russia.</p> <p>19 Q. Do you know what the status</p> <p>20 of the case in Russia is?</p> <p>21 MR. TREMONTE: Objection.</p> <p>22 A. No.</p> <p>23 Q. Now, Ms. Bullock, are you a</p> <p>24 defendant in a matter pending in</p> <p>25 Cyprus?</p>	<p style="text-align: right;">Page 24</p> <p>1 JANNA BULLOCK</p> <p>2 what's been marked as Exhibit 2 in the</p> <p>3 deposition. Could you please review</p> <p>4 Exhibit 2. And you're free to take as</p> <p>5 much time with it as you need.</p> <p>6 I'll direct your attention to</p> <p>7 a Schedule A which is attached to the</p> <p>8 subpoena, and that includes seven pages</p> <p>9 listing documents that were requested</p> <p>10 of you.</p> <p>11 A. Okay.</p> <p>12 Q. Now, Ms. Bullock, you just</p> <p>13 reviewed the document carefully; is</p> <p>14 that right?</p> <p>15 A. Yes.</p> <p>16 Q. Do you recognize the document</p> <p>17 that is Exhibit 2?</p> <p>18 A. This document?</p> <p>19 Q. Yes.</p> <p>20 A. Yes.</p> <p>21 Q. And what is Exhibit 2?</p> <p>22 A. It's a subpoena to produce</p> <p>23 documents.</p> <p>24 Q. And you've received this</p> <p>25 subpoena in the course of this</p>
<p style="text-align: right;">Page 23</p> <p>1 JANNA BULLOCK</p> <p>2 A. I'm one of 30 defendants in a</p> <p>3 matter in Cyprus.</p> <p>4 Q. You understand that the</p> <p>5 reason we are here in the Southern</p> <p>6 District of New York is for discovery</p> <p>7 in aid of that proceeding in Cyprus?</p> <p>8 A. Yes.</p> <p>9 Q. And do you understand that</p> <p>10 when the court in the Southern District</p> <p>11 of New York allowed Gorsoan application</p> <p>12 for discovery, that you were obligated</p> <p>13 to produce certain documents in</p> <p>14 response to a document subpoena?</p> <p>15 A. Yes.</p> <p>16 Q. Did you receive a subpoena to</p> <p>17 produce documents?</p> <p>18 A. Yes.</p> <p>19 MS. DONOVAN: Could we please</p> <p>20 mark as Exhibit 2, the document</p> <p>21 that I'm now handing you.</p> <p>22 (Whereupon, a subpoena was</p> <p>23 marked as Bullock Exhibit 2 for</p> <p>24 Identification.)</p> <p>25 Q. Ms. Bullock, I'm handing you</p>	<p style="text-align: right;">Page 25</p> <p>1 JANNA BULLOCK</p> <p>2 litigation; is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And you understand that you</p> <p>5 have a responsibility to produce</p> <p>6 documents responsive to the subpoena</p> <p>7 request; is that correct?</p> <p>8 A. Yes.</p> <p>9 Q. Now, Ms. Bullock, do you own</p> <p>10 a computer?</p> <p>11 A. Do I own a computer?</p> <p>12 Q. (Nonverbal gesture).</p> <p>13 A. Yes, I do.</p> <p>14 Q. More than one computer?</p> <p>15 A. No. I own one computer.</p> <p>16 Q. And what is that computer?</p> <p>17 A. It's an Apple.</p> <p>18 Q. Is it a laptop?</p> <p>19 A. Yes.</p> <p>20 Q. How long have you had that</p> <p>21 laptop?</p> <p>22 A. I just got it for Christmas.</p> <p>23 Q. And before you had that Apple</p> <p>24 laptop that you received on Christmas</p> <p>25 2017, did you have a computer?</p>

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1 JANNA BULLOCK
 2 A. Yes.
 3 Q. What was that computer?
 4 A. It was an Apple laptop.
 5 Q. And for how long did you have
 6 that other Apple laptop?
 7 A. I don't remember.
 8 Q. What did you do with the
 9 older Apple laptop when you received
 10 the new one?
 11 A. It deformed.
 12 Q. What do you mean by
 13 "deformed"?
 14 A. It just kind of expanded and
 15 battery fall off.
 16 Q. Do you still have that old
 17 Apple laptop?
 18 MR. TREMONTE: Hold on one
 19 second.
 20 Did you get that?
 21 A. It just opened up, the back,
 22 and kind of deformed.
 23 MR. TREMONTE: Just so the
 24 record is clear, I interrupted
 25 because I could see that the court

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1 JANNA BULLOCK
 2 laptop computer?
 3 A. I kept it in my bedroom.
 4 Q. In your apartment in New
 5 York?
 6 A. In the apartment I live in
 7 New York.
 8 Q. Do you have any desktop
 9 computers?
 10 A. No.
 11 Q. Ms. Bullock, do you have an
 12 office?
 13 A. No.
 14 Q. Ms. Bullock, do you
 15 have -- strike that.
 16 Do you have any desktop
 17 computers at any other homes that you
 18 maintain?
 19 MR. TREMONTE: Objection.
 20 MS. DONOVAN: You can answer.
 21 A. No.
 22 Q. Now, your new Apple laptop,
 23 where is that currently?
 24 A. At home.
 25 Q. For what purpose do you use

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1 JANNA BULLOCK
 2 reporter didn't catch the last
 3 couple of words.
 4 Q. Do you still have that
 5 laptop?
 6 A. No.
 7 Q. What did you do with it?
 8 A. I think it was thrown out.
 9 Q. Did you throw it out?
 10 A. Yes.
 11 Q. When?
 12 A. After I got a new one.
 13 Q. What caused the deformity to
 14 the laptop that you described?
 15 MR. TREMONTE: Objection.
 16 Asked and answered.
 17 MS. DONOVAN: You can answer.
 18 A. It was sitting on the
 19 radiator for too long.
 20 Q. Did you use that laptop with
 21 any -- strike that.
 22 How frequently did you use
 23 that old Apple laptop?
 24 A. Not often.
 25 Q. Where did you keep your old

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1 JANNA BULLOCK
 2 your laptop?
 3 A. I don't use it much.
 4 Q. So when you do use it, why
 5 are you using it?
 6 A. I watch movies on it.
 7 Q. You watch movies?
 8 A. (Nonverbal gesture).
 9 Q. What else do you do on your
 10 laptop?
 11 A. I search web.
 12 MR. TREMONTE: I'm sorry,
 13 this isn't an objection, but I'm
 14 just echoing a request by the
 15 court reporter. Jan, if you could
 16 just speak up a little bit.
 17 THE WITNESS: Sure.
 18 Q. Any other uses of your
 19 laptop?
 20 A. No.
 21 Q. Do you use your laptop for
 22 any banking transactions?
 23 A. No.
 24 MR. TREMONTE: Objection.
 25 Q. Do you use your laptop to pay

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9 (Pages 30 to 33)

<p style="text-align: right;">Page 30</p> <p>1 JANNA BULLOCK</p> <p>2 bills?</p> <p>3 MR. TREMONTE: Objection.</p> <p>4 MS. DONOVAN: You can answer.</p> <p>5 A. No.</p> <p>6 Q. Do you use your laptop to pay</p> <p>7 invoices?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 A. No.</p> <p>10 Q. So with respect to the old</p> <p>11 Apple laptop that was thrown out, was</p> <p>12 that computer searched for documents in</p> <p>13 respond to the subpoena that is Exhibit</p> <p>14 2?</p> <p>15 A. Yes.</p> <p>16 Q. Who searched it for</p> <p>17 documents?</p> <p>18 A. We hired a professional</p> <p>19 company.</p> <p>20 Q. Okay.</p> <p>21 A. My lawyers hired a</p> <p>22 professional company.</p> <p>23 Q. Okay.</p> <p>24 THE WITNESS: Can I have a</p> <p>25 little break?</p>	<p style="text-align: right;">Page 32</p> <p>1 JANNA BULLOCK</p> <p>2 Q. And what were those?</p> <p>3 A. It was Janna -- I believe</p> <p>4 JannaBullock@RIGroup.com.</p> <p>5 Q. Did you use any other e-mail</p> <p>6 addresses?</p> <p>7 A. No.</p> <p>8 Q. What internet service</p> <p>9 provider do you use?</p> <p>10 A. Goggle.</p> <p>11 Q. Do you use an internet</p> <p>12 service provider like Comcast?</p> <p>13 A. No. I never heard of</p> <p>14 Comcast.</p> <p>15 Q. Have you heard of AT&T?</p> <p>16 MR. TREMONTE: Objection.</p> <p>17 MS. DONOVAN: You can answer.</p> <p>18 A. Not as an internet provider.</p> <p>19 Q. Okay. Do you understand how</p> <p>20 you get internet in your home?</p> <p>21 A. Yes.</p> <p>22 Q. How do you get internet in</p> <p>23 your home?</p> <p>24 A. We have a cable.</p> <p>25 Q. Okay. And who provides your</p>
<p style="text-align: right;">Page 31</p> <p>1 JANNA BULLOCK</p> <p>2 MR. CUCCARO: There's not a</p> <p>3 question pending.</p> <p>4 Do you mind?</p> <p>5 MS. DONOVAN: That's fine.</p> <p>6 How long do you want?</p> <p>7 THE VIDEOGRAPHER: The time</p> <p>8 is approximately 11:12 a.m. and</p> <p>9 we're going off the record.</p> <p>10 (Whereupon, an off-the-record</p> <p>11 discussion was held at this time.)</p> <p>12 THE VIDEOGRAPHER: The time</p> <p>13 is approximately 11:21 a.m., and</p> <p>14 we are back on the record.</p> <p>15 Q. Ms. Bullock, do you use</p> <p>16 e-mail?</p> <p>17 A. Yes.</p> <p>18 Q. How many e-mail accounts do</p> <p>19 you have currently?</p> <p>20 A. One.</p> <p>21 Q. And what is that e-mail?</p> <p>22 A. It's [REDACTED]</p> <p>23 Q. Have you used any other</p> <p>24 e-mail addresses before?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 33</p> <p>1 JANNA BULLOCK</p> <p>2 cable?</p> <p>3 A. Spectrum.</p> <p>4 Q. Spectrum?</p> <p>5 A. (Nonverbal gesture).</p> <p>6 Q. Was the e-mail address</p> <p>7 [REDACTED] searched for</p> <p>8 documents in response to the document</p> <p>9 subpoena that is Exhibit 2?</p> <p>10 A. Yes.</p> <p>11 Q. And who performed that</p> <p>12 search?</p> <p>13 A. The company that was, I</p> <p>14 believe, approved by court.</p> <p>15 Q. Excuse me?</p> <p>16 A. I believe approved by court.</p> <p>17 It's a professional company.</p> <p>18 Q. The e-mail address,</p> <p>19 JannaBullock@RIGroup.com, was that</p> <p>20 e-mail address searched for documents</p> <p>21 in response to this subpoena?</p> <p>22 A. I do not have access to this</p> <p>23 account since 2008. And I suspect it</p> <p>24 was searched left and right before.</p> <p>25 Q. And how long have you used</p>

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10 (Pages 34 to 37)

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1 JANNA BULLOCK
 2 the e-mail address,
 3 [REDACTED]
 4 A. Ten years.
 5 Q. Ms. Bullock, do you maintain
 6 any electronic files on your laptop?
 7 MR. TREMONTE: Objection to
 8 form.
 9 A. No.
 10 Q. Ms. Bullock, what is your
 11 business?
 12 A. I used to be in real estate
 13 development.
 14 Q. Were there any documents
 15 generated in the course of that real
 16 estate business?
 17 A. Not recently.
 18 Q. So when you were in real
 19 estate, were there documents that were
 20 generated in connection with that
 21 business?
 22 A. Yes.
 23 Q. What types of documents?
 24 A. I don't know.
 25 Q. It was your business,

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1 JANNA BULLOCK
 2 form.
 3 Q. Ms. Bullock --
 4 A. Sorry.
 5 MR. TREMONTE: There's a
 6 question pending, right?
 7 MS. DONOVAN: You can answer.
 8 A. Paper.
 9 Q. Were there any electronic
 10 materials that you maintained in the
 11 course of your real estate business?
 12 A. I'm not very good with
 13 computers. So I always preferred the
 14 paper.
 15 Q. Where do you keep your paper
 16 records?
 17 MR. TREMONTE: Objection to
 18 form.
 19 A. I'm actually very bad with
 20 papers, so I try not to keep it,
 21 because if I keep it, I lose it, and it
 22 makes me very nervous.
 23 Q. So if you're not good with
 24 paper records, who keeps your paper
 25 records.

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1 JANNA BULLOCK
 2 Ms. Bullock.
 3 What types of materials did
 4 you rely on in the course of that
 5 business?
 6 MR. CUCCARO: Objection.
 7 MR. TREMONTE: Objection.
 8 MS. DONOVAN: You can answer.
 9 A. Architectural drawings,
 10 design drawings, specifications of the
 11 structures, finishing materials,
 12 engineering calculations, approvals,
 13 schedules. That's in general.
 14 Q. When were you last involved
 15 in your real estate business?
 16 MR. TREMONTE: Objection to
 17 form.
 18 A. I think the last one was
 19 2013.
 20 Q. So the materials you listed,
 21 drawings, specification, engineering
 22 calculations, approvals, schedules, can
 23 you tell me in what form you kept those
 24 materials?
 25 MR. TREMONTE: Objection to

Page 37

1 JANNA BULLOCK
 2 MR. TREMONTE: Objection to
 3 form.
 4 A. Normally, my attorneys would
 5 keep certain records.
 6 Q. Can you please list the
 7 attorneys that keep your paper records?
 8 A. There was Stuart Smith that
 9 kept my records. Then there were some
 10 attorneys in France that kept my
 11 records. Then there was a whole legal
 12 department in Russia that kept my
 13 records. Then there was a trustee in
 14 Cyprus that kept my records.
 15 Q. Beyond Stuart Smith, were
 16 there any other attorneys in the US who
 17 kept your records?
 18 A. No, because I'm not doing
 19 anything anymore.
 20 Q. Does John Piskora keep
 21 records for you?
 22 A. I don't think so.
 23 Q. Now, how did you
 24 communicate -- strike that.
 25 Did you have employees in

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11 (Pages 38 to 41)

<p style="text-align: right;">Page 38</p> <p>1 JANNA BULLOCK</p> <p>2 your real estate business, Ms. Bullock?</p> <p>3 A. No.</p> <p>4 Q. Who did you work with in the</p> <p>5 real estate business?</p> <p>6 MR. TREMONTE: Objection to</p> <p>7 form.</p> <p>8 A. I worked with several</p> <p>9 architects.</p> <p>10 Q. Can you describe to me the</p> <p>11 nature of your real estate business?</p> <p>12 A. Well, in Russia I built a lot</p> <p>13 of different type of real estate. I've</p> <p>14 built shopping centers, office</p> <p>15 building, gated communities, private</p> <p>16 homes. I restored a few churches.</p> <p>17 I've restored a few, let's say</p> <p>18 historically -- few landmarks.</p> <p>19 Cemeteries.</p> <p>20 Q. And that's work you did in</p> <p>21 Russia.</p> <p>22 A. Mm hm. Yes. Yes.</p> <p>23 Q. In what time period?</p> <p>24 A. As long as I was there.</p> <p>25 Q. And when is that?</p>	<p style="text-align: right;">Page 40</p> <p>1 JANNA BULLOCK</p> <p>2 schedule, we have weekly meetings, site</p> <p>3 meetings.</p> <p>4 Q. Did you use e-mail to</p> <p>5 correspond with the architects?</p> <p>6 A. Most likely.</p> <p>7 Q. In what circumstances did you</p> <p>8 use e-mail?</p> <p>9 MR. TREMONTE: Objection to</p> <p>10 form.</p> <p>11 A. Just regular communication.</p> <p>12 Q. So what is that regular</p> <p>13 communication?</p> <p>14 A. Just work issues. Any work</p> <p>15 issues (indicating). When there's a</p> <p>16 deadline. When there's -- what is the</p> <p>17 due date. What is the status of the</p> <p>18 application. What is the status of the</p> <p>19 engineer. Did they provide the work</p> <p>20 they were supposed to. What is the</p> <p>21 status of the approvals. What is the</p> <p>22 status of expeditors. Like how is DOB</p> <p>23 doing.</p> <p>24 Q. Ms. Bullock, do you have a</p> <p>25 personal assistant?</p>
<p style="text-align: right;">Page 39</p> <p>1 JANNA BULLOCK</p> <p>2 A. From 1994 to 2008.</p> <p>3 Q. Can you tell me about any</p> <p>4 real estate business that you conducted</p> <p>5 in the United States?</p> <p>6 A. I restored several</p> <p>7 townhouses. It mostly involved</p> <p>8 interior work and structural work and</p> <p>9 upgrades, when it comes to smart home,</p> <p>10 plumbing, electric, things of this</p> <p>11 nature. Just a typical refurbishing</p> <p>12 and facelift of the building.</p> <p>13 Q. So when you restored</p> <p>14 townhouses, did you work with</p> <p>15 contractors?</p> <p>16 A. I would normally run a</p> <p>17 project myself, and hire</p> <p>18 subcontractors.</p> <p>19 Q. And you worked with</p> <p>20 architects, correct?</p> <p>21 A. Yes.</p> <p>22 Q. How did you communicate with</p> <p>23 the architects working on your</p> <p>24 townhouse projects?</p> <p>25 A. I call them, we run a</p>	<p style="text-align: right;">Page 41</p> <p>1 JANNA BULLOCK</p> <p>2 A. No, I don't.</p> <p>3 Q. Have you ever had a personal</p> <p>4 assistant?</p> <p>5 A. I have.</p> <p>6 Q. When did you have a personal</p> <p>7 assistant?</p> <p>8 A. A while ago.</p> <p>9 Q. Roughly when was that?</p> <p>10 A. Maybe five years ago.</p> <p>11 Q. In 2013?</p> <p>12 A. Yes, probably.</p> <p>13 Q. Who was your personal</p> <p>14 assistant?</p> <p>15 A. His name was Randall</p> <p>16 Brockett.</p> <p>17 Q. Were you married to</p> <p>18 Mr. Brockett?</p> <p>19 A. Never. That was probably his</p> <p>20 fantasy.</p> <p>21 Q. Ms. Bullock, you testified to</p> <p>22 working with some lawyers.</p> <p>23 Have you worked with any</p> <p>24 financial professionals?</p> <p>25 MR. TREMONTE: Objection to</p>

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12 (Pages 42 to 45)

Page 42	Page 44
<p>1 JANNA BULLOCK</p> <p>2 form.</p> <p>3 A. No. There were few mortgage</p> <p>4 brokers.</p> <p>5 Q. So you worked with mortgage</p> <p>6 brokers?</p> <p>7 A. Really long time ago.</p> <p>8 Q. When is this long time ago?</p> <p>9 A. 2006.</p> <p>10 Q. Was that the last time you</p> <p>11 worked with a mortgage broker?</p> <p>12 A. Yes.</p> <p>13 Q. Do you have an accountant?</p> <p>14 A. My trust -- my tax attorney</p> <p>15 provided the accountant.</p> <p>16 Q. And who is that?</p> <p>17 A. Stuart Smith.</p> <p>18 Q. Do you have any other</p> <p>19 accountants?</p> <p>20 A. Not at the moment.</p> <p>21 Q. Do you currently have any</p> <p>22 accountant?</p> <p>23 A. No.</p> <p>24 Q. When is the last time you</p> <p>25 worked with Mr. Smith as your</p>	<p>1 JANNA BULLOCK</p> <p>2 MS. DONOVAN: You can answer.</p> <p>3 MR. TREMONTE: Are you asking</p> <p>4 for an exhaustive list of all the</p> <p>5 documents?</p> <p>6 MS. DONOVAN: First I want to</p> <p>7 know generally, and then we'll</p> <p>8 follow up.</p> <p>9 Q. Ms. Bullock, are you aware of</p> <p>10 documents produced in response to this</p> <p>11 subpoena?</p> <p>12 A. I remember a long list of</p> <p>13 documents that were produced in</p> <p>14 response to the subpoena.</p> <p>15 Q. And can you enumerate the</p> <p>16 documents that you recall being</p> <p>17 produced in response to the subpoena?</p> <p>18 A. No, I can't.</p> <p>19 MR. TREMONTE: Objection to</p> <p>20 form.</p> <p>21 Q. Can you recall any specific</p> <p>22 document that was produced in response</p> <p>23 to the subpoena?</p> <p>24 A. No. It was a very exhausting</p> <p>25 and long process, and I do not</p>
Page 43	Page 45
<p>1 JANNA BULLOCK</p> <p>2 accountant?</p> <p>3 A. He was -- he was tax</p> <p>4 attorney. So whatever he -- whoever he</p> <p>5 provided.</p> <p>6 Q. When was the last time you</p> <p>7 paid Mr. Smith for any service?</p> <p>8 A. A couple of years ago.</p> <p>9 Q. Did you complete your own</p> <p>10 taxes last year?</p> <p>11 A. Yes.</p> <p>12 Q. And what about in 2016.</p> <p>13 Did you complete your own</p> <p>14 taxes?</p> <p>15 A. Yes.</p> <p>16 Q. In 2015, did you complete</p> <p>17 your own taxes?</p> <p>18 A. I believe so.</p> <p>19 Q. Were those taxes produced in</p> <p>20 response to the subpoena?</p> <p>21 A. I don't know.</p> <p>22 Q. Are you aware what was</p> <p>23 produced in response to this subpoena?</p> <p>24 MR. TREMONTE: Objection to</p> <p>25 form.</p>	<p>1 JANNA BULLOCK</p> <p>2 remember. It was --</p> <p>3 MR. TREMONTE: I'm going to</p> <p>4 ask you to wait until a question</p> <p>5 is pending to speak.</p> <p>6 THE WITNESS: Okay. Sorry.</p> <p>7 Q. So you no longer work with an</p> <p>8 accountant; is that right?</p> <p>9 MR. TREMONTE: Objection.</p> <p>10 A. Yes. I don't know what to</p> <p>11 say. I don't know.</p> <p>12 Q. Does anyone manage</p> <p>13 investments for you, Ms. Bullock?</p> <p>14 A. No.</p> <p>15 Q. Do you have any investments?</p> <p>16 A. No.</p> <p>17 Q. Ms. Bullock, you mentioned</p> <p>18 lawyers in France who keep records for</p> <p>19 you.</p> <p>20 Do they currently keep</p> <p>21 records for you?</p> <p>22 A. I don't know.</p> <p>23 Q. Who are those lawyers?</p> <p>24 MR. TREMONTE: Objection to</p> <p>25 form.</p>

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13 (Pages 46 to 49)

<p style="text-align: right;">Page 46</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't remember their names.</p> <p>3 There were quite a few of them. I was</p> <p>4 very stressful time. I don't remember</p> <p>5 those lawyers.</p> <p>6 Q. Did you retain a law firm in</p> <p>7 France to do work for you?</p> <p>8 A. Yes. There were a few law</p> <p>9 firms before.</p> <p>10 Q. Do you recall which law firms</p> <p>11 you retained?</p> <p>12 MR. TREMONTE: Objection.</p> <p>13 You can answer.</p> <p>14 I just made an objection to</p> <p>15 the form of the question.</p> <p>16 A. There were a few of them. I</p> <p>17 don't remember their name.</p> <p>18 Q. Do you remember any of those</p> <p>19 law firms in France?</p> <p>20 MR. TREMONTE: Objection to</p> <p>21 form.</p> <p>22 A. One was BFM. One was Salons</p> <p>23 [phonetic].</p> <p>24 Q. You testified earlier that</p> <p>25 some attorneys in Russia had kept</p>	<p style="text-align: right;">Page 48</p> <p>1 JANNA BULLOCK</p> <p>2 communicated with Mr. Papas?</p> <p>3 MR. TREMONTE: Objection to</p> <p>4 form.</p> <p>5 A. The only time I communicated</p> <p>6 with Mr. Papas was 2006.</p> <p>7 Q. Tell me about your</p> <p>8 relationship with Mr. Papas.</p> <p>9 MR. TREMONTE: Objection to</p> <p>10 form.</p> <p>11 A. I don't have any relationship</p> <p>12 Mr. Papas. I saw him once and I spoke</p> <p>13 with him once in my life. I went to</p> <p>14 Cyprus with my ex-husband's</p> <p>15 acquaintance, and I met Mr. Papas.</p> <p>16 Q. How many times have you</p> <p>17 travelled to Cyprus?</p> <p>18 A. Once.</p> <p>19 Q. When was this trip to Cyprus?</p> <p>20 MR. TREMONTE: Objection.</p> <p>21 A. 2006.</p> <p>22 Q. And who was the acquaintance</p> <p>23 of your ex-husband that you travelled</p> <p>24 with?</p> <p>25 A. His name is Sergey Efros,</p>
<p style="text-align: right;">Page 47</p> <p>1 JANNA BULLOCK</p> <p>2 documents for you.</p> <p>3 Who were those attorneys?</p> <p>4 A. That was legal department in</p> <p>5 RIGroup.</p> <p>6 Q. And when you say "RIGroup,"</p> <p>7 is that RIGroup 000?</p> <p>8 A. Yes.</p> <p>9 Q. You also testified that</p> <p>10 attorneys in Cyprus kept documents for</p> <p>11 you.</p> <p>12 Who were those attorneys?</p> <p>13 A. A trustee in Cyprus. I don't</p> <p>14 know whether he's an attorney or a</p> <p>15 trustee.</p> <p>16 Q. Who is the trustee in Cyprus</p> <p>17 that you're referring to?</p> <p>18 A. His last name is Papas.</p> <p>19 Q. Is that Mr. Papas then?</p> <p>20 MR. TREMONTE: Objection.</p> <p>21 Q. Does Mr. Papas currently keep</p> <p>22 documents for you?</p> <p>23 A. No. I don't have any</p> <p>24 communication with Mr. Papas.</p> <p>25 Q. What was the last time you</p>	<p style="text-align: right;">Page 49</p> <p>1 JANNA BULLOCK</p> <p>2 E-F-R-O-S.</p> <p>3 Q. What is Mr. Efros's</p> <p>4 employment.</p> <p>5 A. I don't know.</p> <p>6 Q. Do you know what he did for</p> <p>7 work in 2006?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 A. No.</p> <p>10 Q. In what capacity did you know</p> <p>11 Mr. Efros?</p> <p>12 MR. TREMONTE: Objection.</p> <p>13 A. I saw him at my house.</p> <p>14 Q. Your house where?</p> <p>15 A. My ex-husband's house in</p> <p>16 Moscow.</p> <p>17 Q. And what was the purpose of</p> <p>18 your trip to Cyprus in 2006?</p> <p>19 A. To set up trust for my</p> <p>20 children.</p> <p>21 Q. What was Mr. Papas' company?</p> <p>22 MR. TREMONTE: Objection.</p> <p>23 A. I don't know. I was told</p> <p>24 he's professional trustee.</p> <p>25 Q. Who told you about Mr. Papas?</p>

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14 (Pages 50 to 53)

<p style="text-align: right;">Page 50</p> <p>1 JANNA BULLOCK</p> <p>2 MR. TREMONTE: Objection.</p> <p>3 I'm just going to caution you</p> <p>4 to the extent you had a</p> <p>5 communication with a lawyer that's</p> <p>6 privileged, don't answer.</p> <p>7 But if you learned -- if you</p> <p>8 have an answer to that question</p> <p>9 and you learned it from somebody</p> <p>10 who's not a lawyer, it's fine.</p> <p>11 Just answer it.</p> <p>12 A. I don't know. He was</p> <p>13 presented as a lawyer.</p> <p>14 Q. Excuse me. Papas was</p> <p>15 presented as a lawyer?</p> <p>16 A. Mm hm.</p> <p>17 Q. And who told you about Papas?</p> <p>18 Taking into account what your</p> <p>19 lawyer said, don't tell me anything</p> <p>20 that's protected by an attorney-client</p> <p>21 privilege.</p> <p>22 MR. TREMONTE: Objection to</p> <p>23 form.</p> <p>24 A. Can you repeat your question?</p> <p>25 Q. Who told you that Mr. Papas</p>	<p style="text-align: right;">Page 52</p> <p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. Do you know if Efros ever</p> <p>4 paid Mr. Papas for creating trust for</p> <p>5 your children?</p> <p>6 A. I don't know.</p> <p>7 Q. And it's your testimony that</p> <p>8 you have not spoken with Papas since</p> <p>9 2006?</p> <p>10 MR. TREMONTE: Objection to</p> <p>11 form.</p> <p>12 Asked and answered.</p> <p>13 A. No.</p> <p>14 Q. So what is your testimony?</p> <p>15 MR. TREMONTE: Objection.</p> <p>16 A. My testimony is that I had</p> <p>17 one contact with Papas.</p> <p>18 Q. And do you mean one in-person</p> <p>19 meeting with Papas?</p> <p>20 A. Yes.</p> <p>21 Q. Did you have subsequent</p> <p>22 e-mail communication with Papas?</p> <p>23 A. No.</p> <p>24 Q. Did you have any subsequent</p> <p>25 phone conversations with Papas?</p>
<p style="text-align: right;">Page 51</p> <p>1 JANNA BULLOCK</p> <p>2 provided trustee services?</p> <p>3 A. Efros.</p> <p>4 Q. Okay. Had Efros worked with</p> <p>5 Papas previously?</p> <p>6 A. I would think so.</p> <p>7 Q. Can you tell me about the</p> <p>8 services you engaged Mr. Papas to do</p> <p>9 for you?</p> <p>10 A. I did not engage Mr. Papas to</p> <p>11 do any services for me.</p> <p>12 Q. Did Mr. Papas create trust</p> <p>13 for you?</p> <p>14 MR. TREMONTE: Objection.</p> <p>15 A. Mr. Papas created trust for</p> <p>16 my children.</p> <p>17 Q. Okay. Who engaged Mr. Papas</p> <p>18 to create trust for your children?</p> <p>19 A. Efros.</p> <p>20 Q. Does Mr. Papas charge for his</p> <p>21 services in creating trust?</p> <p>22 A. I don't know.</p> <p>23 Q. Did you ever pay Mr. Papas</p> <p>24 for his services in creating trust for</p> <p>25 your children?</p>	<p style="text-align: right;">Page 53</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't recall.</p> <p>3 Q. Do you recall interacting</p> <p>4 with Papas at any point after 2006?</p> <p>5 A. I don't recall.</p> <p>6 MR. TREMONTE: Don't forget</p> <p>7 to hydrate.</p> <p>8 THE WITNESS: I know.</p> <p>9 Q. How many trust did Papas</p> <p>10 create for you?</p> <p>11 A. For my children.</p> <p>12 Q. How many trust?</p> <p>13 A. Three.</p> <p>14 Q. And what are those trust?</p> <p>15 A. Azur Trust.</p> <p>16 Q. Could you spell that?</p> <p>17 A. A-Z-U-R. Purple Trust, and</p> <p>18 Gold Ventures.</p> <p>19 Q. What assets are held by the</p> <p>20 Azur Trust?</p> <p>21 A. I don't think anything is</p> <p>22 held by Azur Trust anymore. I don't</p> <p>23 know.</p> <p>24 Q. At the time of the creation</p> <p>25 of Azur Trust, what assets did the Azur</p>

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15 (Pages 54 to 57)

<p style="text-align: right;">Page 54</p> <p>1 JANNA BULLOCK</p> <p>2 Trust hold?</p> <p>3 MR. TREMONTE: Objection to</p> <p>4 the form.</p> <p>5 A. There was an apartment in</p> <p>6 Paris and a house in Saint-Tropez.</p> <p>7 Q. Any other assets held by the</p> <p>8 Azur Trust other than the apartment in</p> <p>9 Paris and the house in Saint-Tropez?</p> <p>10 A. Not anymore.</p> <p>11 Q. At any point since 2006?</p> <p>12 A. I don't recall.</p> <p>13 Q. What's the address of the</p> <p>14 apartment in Paris?</p> <p>15 A. Seventy-three Quai d'Orsay.</p> <p>16 Q. You said that the Azur Trust</p> <p>17 no longer holds the apartment in Paris.</p> <p>18 What happened to the</p> <p>19 apartment?</p> <p>20 A. This is not what I said. I</p> <p>21 said I don't know.</p> <p>22 Q. Do you own the apartment</p> <p>23 located at 73 Quai d'Orsay?</p> <p>24 A. No.</p> <p>25 Q. Do you know who does own the</p>	<p style="text-align: right;">Page 56</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't recall.</p> <p>3 Q. Is it longer than five years</p> <p>4 ago?</p> <p>5 A. Yes.</p> <p>6 Q. When did you acquire the</p> <p>7 apartment at 73 Quai d'Orsay?</p> <p>8 A. I don't remember.</p> <p>9 MR. TREMONTE: Objection to</p> <p>10 form.</p> <p>11 A. I don't remember.</p> <p>12 Q. At some point in time, did</p> <p>13 you acquire the apartment at 73 Quai</p> <p>14 d'Orsay?</p> <p>15 A. Yes.</p> <p>16 Q. Do you recall when that was?</p> <p>17 A. No.</p> <p>18 Q. Was it with your ex-husband?</p> <p>19 A. No.</p> <p>20 Q. Did you acquire the apartment</p> <p>21 at 73 Quai d'Orsay with anyone else?</p> <p>22 A. I acquired the apartment at</p> <p>23 73 Quai d'Orsay with the help of</p> <p>24 someone else.</p> <p>25 Q. Who was that?</p>
<p style="text-align: right;">Page 55</p> <p>1 JANNA BULLOCK</p> <p>2 apartment at 73 Quai d'Orsay?</p> <p>3 A. The apartment in -- at 73</p> <p>4 Quai d'Orsay was put in a trust at the</p> <p>5 time of acquisition.</p> <p>6 Q. And that's the Azur Trust?</p> <p>7 A. At that time it was Azur</p> <p>8 Trust.</p> <p>9 Q. What has happened to the</p> <p>10 apartment at 73 Quai d'Orsay since the</p> <p>11 creation of the Azur Trust?</p> <p>12 A. I don't know.</p> <p>13 Q. Have you followed up at any</p> <p>14 point in time about the apartment at 73</p> <p>15 Quai d'Orsay?</p> <p>16 MR. TREMONTE: Objection to</p> <p>17 form.</p> <p>18 MR. CUCCARO: Objection.</p> <p>19 A. No.</p> <p>20 Q. Have you stayed at the</p> <p>21 apartment at 73 Quai d'Orsay?</p> <p>22 A. Not for long time.</p> <p>23 Q. When was the last time you</p> <p>24 stayed at the apartment at 73 Quai</p> <p>25 d'Orsay?</p>	<p style="text-align: right;">Page 57</p> <p>1 JANNA BULLOCK</p> <p>2 A. That person name was Jeffrey</p> <p>3 Steiner.</p> <p>4 Q. Who is Jeffrey Steiner?</p> <p>5 A. He was my close friend and a</p> <p>6 business partner.</p> <p>7 Q. Did you each have shares of</p> <p>8 the apartment at 73 Quai d'Orsay?</p> <p>9 MR. TREMONTE: Objection.</p> <p>10 A. I don't remember an exact</p> <p>11 structure.</p> <p>12 Q. What was the arrangement</p> <p>13 between you and Mr. Steiner concerning</p> <p>14 the apartment at 73 Quai d'Orsay?</p> <p>15 A. He provided the mortgage.</p> <p>16 Q. How much was the mortgage on</p> <p>17 the apartment at 73 Quai d'Orsay at</p> <p>18 that time?</p> <p>19 A. It was acquisition price of</p> <p>20 the apartment.</p> <p>21 Q. What was the acquisition</p> <p>22 price of the apartment?</p> <p>23 A. I don't remember exactly.</p> <p>24 Q. Do you recall roughly?</p> <p>25 A. No.</p>

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16 (Pages 58 to 61)

<p style="text-align: right;">Page 58</p> <p>1 JANNA BULLOCK</p> <p>2 Q. Do you recall whether it was</p> <p>3 more than 5 million Euros?</p> <p>4 A. I never was involved in the</p> <p>5 financial transaction, so I really</p> <p>6 don't remember.</p> <p>7 Q. Who was involved in the</p> <p>8 financial transactions concerning the</p> <p>9 apartment at 73 Quai d'Orsay?</p> <p>10 A. Mr. Steiner.</p> <p>11 Q. And who was funding the</p> <p>12 apartment at 73 Quai d'Orsay?</p> <p>13 A. Mr. Steiner.</p> <p>14 Q. And what was your ownership</p> <p>15 interest?</p> <p>16 MR. TREMONTE: Objection to</p> <p>17 form.</p> <p>18 A. I put this apartment into the</p> <p>19 trust to benefit my children.</p> <p>20 Q. Did Mr. Steiner gift you the</p> <p>21 apartment at 73 Quai d'Orsay?</p> <p>22 MR. TREMONTE: Objection.</p> <p>23 Calls for a legal conclusion.</p> <p>24 MS. DONOVAN: You can answer.</p> <p>25 A. He provided the mortgage.</p>	<p style="text-align: right;">Page 60</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. Did you sue any document</p> <p>4 concerning the Azur Trust?</p> <p>5 A. I only saw the settling</p> <p>6 papers (indicating).</p> <p>7 Q. You mentioned a home that was</p> <p>8 held by the Azur Trust in Saint-Tropez.</p> <p>9 Did you acquire that home at</p> <p>10 some point in time?</p> <p>11 A. Trust acquired that home at a</p> <p>12 certain time.</p> <p>13 Q. So I understand from your</p> <p>14 prior testimony that the trust held the</p> <p>15 house in Saint-Tropez and the apartment</p> <p>16 in Paris.</p> <p>17 Did the trust acquire the</p> <p>18 house in Saint-Tropez?</p> <p>19 MR. TREMONTE: Objection to</p> <p>20 form.</p> <p>21 A. I don't know.</p> <p>22 Q. When was the house in</p> <p>23 Saint-Tropez acquired?</p> <p>24 MR. TREMONTE: Objection to</p> <p>25 form.</p>
<p style="text-align: right;">Page 59</p> <p>1 JANNA BULLOCK</p> <p>2 Q. What do you mean when you say</p> <p>3 "he provided a mortgage"?</p> <p>4 MR. TREMONTE: Objection.</p> <p>5 A. I mean that he provided a</p> <p>6 mortgage.</p> <p>7 Q. Did you make mortgage</p> <p>8 payments to Mr. Steiner?</p> <p>9 A. At some point, the mortgage</p> <p>10 was satisfied.</p> <p>11 Q. Ms. Bullock, did you make</p> <p>12 mortgage payments to Mr. Steiner for</p> <p>13 the apartment at 73 Quai d'Orsay?</p> <p>14 A. That was trust</p> <p>15 responsibility.</p> <p>16 Q. Did the Azur Trust make</p> <p>17 mortgage payments to Mr. Steiner?</p> <p>18 A. I don't know.</p> <p>19 Q. What other responsibility</p> <p>20 belonged to the Azur Trust?</p> <p>21 A. I don't know.</p> <p>22 Q. Were there any documents</p> <p>23 entered into in connection with the</p> <p>24 creation of the Azur Trust?</p> <p>25 MR. TREMONTE: Objection.</p>	<p style="text-align: right;">Page 61</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't remember.</p> <p>3 Q. Roughly when?</p> <p>4 A. I don't remember. In the</p> <p>5 early 2000s.</p> <p>6 Q. Before 2006?</p> <p>7 MR. TREMONTE: Objection.</p> <p>8 A. I don't remember.</p> <p>9 Q. Are there documents that you</p> <p>10 could look at that would refresh your</p> <p>11 recollection?</p> <p>12 A. I don't have any documents.</p> <p>13 Q. Is the Azur Trust still</p> <p>14 providing any service on</p> <p>15 behalf -- strike that.</p> <p>16 Is the Azur Trust still</p> <p>17 holding assets on behalf of your</p> <p>18 children?</p> <p>19 A. I don't know.</p> <p>20 Q. Approximately what's the</p> <p>21 value of the assets that were held by</p> <p>22 the Azur Trust in 2006?</p> <p>23 A. I don't know.</p> <p>24 Q. More than \$3 million?</p> <p>25 MR. TREMONTE: Objection.</p>

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17 (Pages 62 to 65)

<p style="text-align: right;">Page 62</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. Do you have any sense of the</p> <p>4 value of the apartment at 73 Quai</p> <p>5 d'Orsay?</p> <p>6 MR. TREMONTE: Objection.</p> <p>7 A. No.</p> <p>8 Q. Do you have any sense of the</p> <p>9 value of the home in Saint-Tropez?</p> <p>10 MR. TREMONTE: Objection.</p> <p>11 A. No.</p> <p>12 Q. Do you still use the home in</p> <p>13 Saint-Tropez?</p> <p>14 A. No.</p> <p>15 Q. When was the last time you</p> <p>16 used the home in Saint-Tropez?</p> <p>17 A. A really long time ago.</p> <p>18 Q. Roughly when?</p> <p>19 A. Maybe eight years ago.</p> <p>20 Q. Have you been to Saint-Tropez</p> <p>21 any time in the last eight years?</p> <p>22 A. Not recently.</p> <p>23 Q. When was the last time you</p> <p>24 went to Saint-Tropez?</p> <p>25 A. I don't remember. Not</p>	<p style="text-align: right;">Page 64</p> <p>1 JANNA BULLOCK</p> <p>2 MS. DONOVAN: So let's go off</p> <p>3 the record for a second.</p> <p>4 THE VIDEOGRAPHER: The time</p> <p>5 is approximately 11:59 a.m.</p> <p>6 This will end Media Unit</p> <p>7 Number 1, and we're going off the</p> <p>8 record.</p> <p>9 (Whereupon, a short break was</p> <p>10 taken at this time.)</p> <p>11 THE VIDEOGRAPHER: The time</p> <p>12 is approximately 12:11 p.m.</p> <p>13 This is the start of Media</p> <p>14 Unit Number 2, and we are back on</p> <p>15 the record.</p> <p>16 Q. Ms. Bullock, I'm going to</p> <p>17 provide you what I'll have the court</p> <p>18 reporter mark as Exhibit 3.</p> <p>19 (Whereupon, Cyprus filings</p> <p>20 were marked as Bullock Exhibit 3</p> <p>21 for Identification.)</p> <p>22 Q. Ms. Bullock, can you review</p> <p>23 Exhibit 3.</p> <p>24 MR. TREMONTE: Let the record</p> <p>25 reflect that this is a 17-page</p>
<p style="text-align: right;">Page 63</p> <p>1 JANNA BULLOCK</p> <p>2 recently.</p> <p>3 Q. Have you stayed elsewhere in</p> <p>4 Saint-Tropez other than the home that</p> <p>5 was held by the Azur Trust?</p> <p>6 A. Yes.</p> <p>7 MR. TREMONTE: That's at any</p> <p>8 time?</p> <p>9 Q. So Ms. Bullock, in the last</p> <p>10 eight years, have you stayed at any</p> <p>11 other home in Saint-Tropez than the one</p> <p>12 that is held by the Azur Trust?</p> <p>13 A. Yes.</p> <p>14 Q. Have those been private</p> <p>15 homes?</p> <p>16 A. Yes.</p> <p>17 Q. Did you rent any residences</p> <p>18 in Saint-Tropez in the last eight</p> <p>19 years?</p> <p>20 A. No.</p> <p>21 MR. TREMONTE: Caroline, if</p> <p>22 you're nearing the end of topic</p> <p>23 segment, we're right up on noon.</p> <p>24 I request a break,</p> <p>25 principally for my benefit.</p>	<p style="text-align: right;">Page 65</p> <p>1 JANNA BULLOCK</p> <p>2 document. At least five or six</p> <p>3 pages of which appear to be in</p> <p>4 modern Greek.</p> <p>5 Q. Ms. Bullock, do you recognize</p> <p>6 the document that is in front of you as</p> <p>7 Exhibit 3?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 A. (Nonverbal gesture).</p> <p>10 MS. DONOVAN: You can answer,</p> <p>11 Ms. Bullock.</p> <p>12 A. Yes.</p> <p>13 Q. And what is it?</p> <p>14 A. It's some filings from Cyprus</p> <p>15 case. I assume it's a translation of</p> <p>16 the filings of the Cyprus Gorsoan and</p> <p>17 Gazprombank —</p> <p>18 (Reporter interruption for</p> <p>19 clarification.)</p> <p>20 A. It's the translation of a</p> <p>21 Cyprus claim of Gazprombank and</p> <p>22 Gorsoan. Gorsoan and Gazprombank.</p> <p>23 Q. Ms. Bullock, have you ever</p> <p>24 before seen the document that's before</p> <p>25 you as Exhibit 3?</p>

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18 (Pages 66 to 69)

Page 66	Page 68
<p>1 JANNA BULLOCK</p> <p>2 A. I have.</p> <p>3 Q. When did you see the document</p> <p>4 that's before you as Exhibit 3?</p> <p>5 A. I don't remember.</p> <p>6 Q. Ms. Bullock, are you aware of</p> <p>7 the fact that the Cyprus court froze</p> <p>8 your assets in connection with the</p> <p>9 Cyprus litigation?</p> <p>10 A. I don't have any assets.</p> <p>11 Q. Are you aware that the Cyprus</p> <p>12 court issued an order freezing your</p> <p>13 assets?</p> <p>14 MR. TREMONTE: Objection.</p> <p>15 A. No, I'm not.</p> <p>16 Q. You're not aware?</p> <p>17 A. No.</p> <p>18 Q. Ms. Bullock, please turn to</p> <p>19 what's at the top part of the page.</p> <p>20 You'll see Page 3 of 17.</p> <p>21 A. Page 3. Okay.</p> <p>22 Q. All right. And that</p> <p>23 paragraph one, about one third of the</p> <p>24 way down the page, the order states --</p> <p>25 and I'm reading here, "The order of</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. What do you understand a</p> <p>3 court order to mean?</p> <p>4 MR. TREMONTE: Objection.</p> <p>5 MR. CUCCARO: Objection.</p> <p>6 MS. DONOVAN: You can answer.</p> <p>7 MR. TREMONTE: She's asking</p> <p>8 you in general.</p> <p>9 Do you have a general</p> <p>10 understanding of what a court order is?</p> <p>11 THE WITNESS: Yes, I do.</p> <p>12 Q. And what is that general</p> <p>13 understanding?</p> <p>14 A. It's a court order. It's</p> <p>15 something that is ordered by the court.</p> <p>16 Q. And were you aware that a</p> <p>17 court in Cyprus ordered that any assets</p> <p>18 you have be frozen?</p> <p>19 MR. TREMONTE: Objection.</p> <p>20 Asked and answered twice.</p> <p>21 You can answer.</p> <p>22 A. I don't have an answer.</p> <p>23 Q. You testified that you had</p> <p>24 seen this order before.</p> <p>25 In what circumstances had you</p>
Page 67	Page 69
<p>1 JANNA BULLOCK</p> <p>2 paragraph one as has been modified by</p> <p>3 the court on 14.8.2012, becomes</p> <p>4 absolute."</p> <p>5 Did I read that correctly?</p> <p>6 MR. TREMONTE: Objection.</p> <p>7 The document speaks for</p> <p>8 itself.</p> <p>9 MS. DONOVAN: You can answer.</p> <p>10 MR. TREMONTE: She's asking</p> <p>11 you if the words that she's read</p> <p>12 on the page are the same as the</p> <p>13 words that you see in front of</p> <p>14 you.</p> <p>15 THE WITNESS: Yes.</p> <p>16 Q. Ms. Bullock, are you familiar</p> <p>17 with an earlier order of the court in</p> <p>18 Cyprus that was dated August 14, 2012?</p> <p>19 A. When was this claim filed?</p> <p>20 Q. Ms. Bullock, do you</p> <p>21 understand that this is an order from</p> <p>22 the court in Cyprus?</p> <p>23 MR. TREMONTE: Objection.</p> <p>24 Calls for a legal conclusion.</p> <p>25 A. I don't know what it is.</p>	<p>1 JANNA BULLOCK</p> <p>2 seen this order before?</p> <p>3 A. I don't remember.</p> <p>4 Q. Ms. Bullock, what's your</p> <p>5 understanding of the current status of</p> <p>6 the proceeding in Cyprus?</p> <p>7 MR. TREMONTE: Objection to</p> <p>8 form.</p> <p>9 A. I don't know.</p> <p>10 Q. Do you understand that a case</p> <p>11 in Cyprus is still active?</p> <p>12 A. Probably.</p> <p>13 Q. Are you appearing in a case</p> <p>14 in Cyprus?</p> <p>15 MR. TREMONTE: Objection to</p> <p>16 form.</p> <p>17 A. According to this page, yes.</p> <p>18 Q. Have you retained lawyers to</p> <p>19 represent you in Cyprus?</p> <p>20 A. Not personally.</p> <p>21 Q. When you say "not</p> <p>22 personally," what do you mean?</p> <p>23 A. That's what I mean.</p> <p>24 Q. Has anyone retained lawyers</p> <p>25 to represent you in Cyprus?</p>

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19 (Pages 70 to 73)

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<p>1 JANNA BULLOCK</p> <p>2 A. I don't remember the</p> <p>3 specifics.</p> <p>4 Q. Do you remember any — in</p> <p>5 more general terms whether any lawyers</p> <p>6 represent you in Cyprus?</p> <p>7 A. What I understand about</p> <p>8 Cyprus that Vladimir Putin personal</p> <p>9 account administrator is the president</p> <p>10 of the country, therefore, anything in</p> <p>11 Cyprus is possible. Now, I once</p> <p>12 understand that Cyprus is completely</p> <p>13 and fully built on Russian money, that</p> <p>14 specifically come from Gazprombank,</p> <p>15 therefore, anything that comes from</p> <p>16 Cyprus is possible.</p> <p>17 Q. Ms. Bullock, that's not</p> <p>18 responsive.</p> <p>19 The question is, do any</p> <p>20 lawyers represent you in Cyprus?</p> <p>21 A. Yes.</p> <p>22 Q. Who?</p> <p>23 A. A Mr. Akileus Anstesos.</p> <p>24 Q. And if you go to Page 2 in</p> <p>25 the attachment in Exhibit 3, carrying</p>	<p>1 JANNA BULLOCK</p> <p>2 redactions are done by your</p> <p>3 counsel, not by any counsel.</p> <p>4 They can't redact a document</p> <p>5 that you produce.</p> <p>6 Q. Do you recognize the document</p> <p>7 before you as Exhibit 4?</p> <p>8 A. No.</p> <p>9 Q. Now, at the bottom</p> <p>10 communication from John Piskora to a</p> <p>11 Mathias Vuillermet, May 28, 2013.</p> <p>12 Who is John Piskora?</p> <p>13 A. John Piskora is an attorney.</p> <p>14 Q. Your attorney, correct?</p> <p>15 A. He is an attorney.</p> <p>16 Q. Does Mr. Piskora do legal</p> <p>17 work for you?</p> <p>18 A. I sometimes seek general</p> <p>19 advice from him.</p> <p>20 Q. General legal advice?</p> <p>21 A. General advice.</p> <p>22 Q. Okay. What about Mathias</p> <p>23 Vuillermet.</p> <p>24 Who is he?</p> <p>25 A. Mathias was an attorney.</p>
Page 71	Page 73
<p>1 JANNA BULLOCK</p> <p>2 over into Page 3, did you understand</p> <p>3 that by an order of the Cyprus court,</p> <p>4 your assets were frozen?</p> <p>5 MR. TREMONTE: Objection.</p> <p>6 Asked and answered three</p> <p>7 times.</p> <p>8 You can answer.</p> <p>9 A. I don't know.</p> <p>10 MS. DONOVAN: I'll just mark</p> <p>11 this as Exhibit 4.</p> <p>12 (Whereupon, a document was</p> <p>13 marked as Bullock Exhibit 4 for</p> <p>14 Identification.)</p> <p>15 Q. And Ms. Bullock, if you'll</p> <p>16 please look at what's been mark as</p> <p>17 Exhibit 4, the document Bates-labeled</p> <p>18 Bullock-8041, continuing 8042.</p> <p>19 MS. DONOVAN: And for your</p> <p>20 reference, Ms. Bullock, any</p> <p>21 redaction, the black box was done</p> <p>22 by counsel before producing the</p> <p>23 document for a claim of privilege.</p> <p>24 MR. TREMONTE: And just so</p> <p>25 the record is clear, the</p>	<p>1 JANNA BULLOCK</p> <p>2 It's one of the French attorneys whose</p> <p>3 name I've even forgotten.</p> <p>4 Q. And you're copied on this</p> <p>5 communication, Ms. Bullock.</p> <p>6 For what reason did you</p> <p>7 understand Mr. Brockett to be copied?</p> <p>8 A. As I mentioned earlier, he</p> <p>9 was my personal assistant at some time.</p> <p>10 Q. Okay. And then it says in</p> <p>11 the subject line, Cyprus case number</p> <p>12 two, decision-granting course, initial</p> <p>13 application for asset freezing order.</p> <p>14 Ms. Bullock, does this</p> <p>15 refresh your recollection when you</p> <p>16 became aware of a freezing order from</p> <p>17 the Cyprus court?</p> <p>18 MR. TREMONTE: Objection to</p> <p>19 form.</p> <p>20 A. I'm under tremendous amount</p> <p>21 of pressure and certain things I just</p> <p>22 don't remember.</p> <p>23 Q. So you don't remember lawyers</p> <p>24 that you paid sending you a</p> <p>25 communication that your assets have</p>

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20 (Pages 74 to 77)

Page 74	Page 76
<p>1 JANNA BULLOCK</p> <p>2 been frozen?</p> <p>3 MR. CUCCARO: Objection.</p> <p>4 MR. TREMONTE: Objection to</p> <p>5 form.</p> <p>6 A. I don't.</p> <p>7 Q. What did you understand a</p> <p>8 freezing order to require?</p> <p>9 MR. TREMONTE: Objection.</p> <p>10 A. I more understand what the</p> <p>11 freezing order from Cyprus is.</p> <p>12 Q. What is the freezing order</p> <p>13 from Cyprus?</p> <p>14 MR. TREMONTE: Objection.</p> <p>15 A. Anything possible in Cyprus.</p> <p>16 Anything.</p> <p>17 Q. So you just testified that</p> <p>18 you more understand what a freezing</p> <p>19 order -- what the freezing order from</p> <p>20 Cyprus is; is that correct?</p> <p>21 MR. TREMONTE: Objection.</p> <p>22 A. Yes.</p> <p>23 Q. And so it seems, Ms. Bullock,</p> <p>24 that you have an understanding of the</p> <p>25 Cyprus court's freezing order, correct?</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. And at no point since, have</p> <p>3 you became aware of the freezing order?</p> <p>4 A. No.</p> <p>5 Q. All right. Ms. Bullock, in</p> <p>6 Exhibit 5, Page 3 of 6, we're going to</p> <p>7 review what the order said, and you're</p> <p>8 going to tell me what you understand</p> <p>9 certain words to me, okay.</p> <p>10 So I'm reading -- just to get</p> <p>11 us started, "To issued and an order is</p> <p>12 hereby issued which prohibits</p> <p>13 defendants 1 to 15, and each defendant</p> <p>14 separately, from directly or</p> <p>15 indirectly, through their employees,</p> <p>16 their representative, their agents, or</p> <p>17 any other legal or natural person,</p> <p>18 transfer, donate, sell, convey, charge,</p> <p>19 mortgage, alienate, or diminish, in any</p> <p>20 manner, their assets in Cyprus and/or</p> <p>21 anywhere else in the world up to an</p> <p>22 amount of US dollars, \$26,344,765 or to</p> <p>23 an equivalent to any other foreign</p> <p>24 currency whether these assets be in</p> <p>25 their name or in the name of other</p>
Page 75	Page 77
<p>1 JANNA BULLOCK</p> <p>2 MR. TREMONTE: Objection.</p> <p>3 A. I don't know. I don't have</p> <p>4 answer to this question.</p> <p>5 MS. DONOVAN: Can we please</p> <p>6 mark this as Exhibit 5.</p> <p>7 (Whereupon, an order was</p> <p>8 marked as Bullock Exhibit 5 for</p> <p>9 Identification.)</p> <p>10 Q. Ms. Bullock, I'm giving you</p> <p>11 what's been marked as Exhibit 5.</p> <p>12 Take a moment and review</p> <p>13 Exhibit 5.</p> <p>14 A. What?</p> <p>15 Q. Ms. Bullock, have you before</p> <p>16 seen the document marked as Exhibit 5?</p> <p>17 A. No.</p> <p>18 Q. And were you aware that in</p> <p>19 August 2012, the court in Cyprus issued</p> <p>20 an interim order freezing yours and</p> <p>21 other defendant's assets?</p> <p>22 A. I don't know.</p> <p>23 Q. You don't have any</p> <p>24 recollection?</p> <p>25 A. I don't know.</p>	<p>1 JANNA BULLOCK</p> <p>2 individuals, or belong to them</p> <p>3 exclusively or jointly or separately as</p> <p>4 a whole or a trust or as any other form</p> <p>5 of ownership directly or indirectly</p> <p>6 through other natural or legal entities</p> <p>7 / until the final completion of the</p> <p>8 lawsuit under the above-mentioned</p> <p>9 number and title and/or new order of</p> <p>10 the court."</p> <p>11 Ms. Bullock, are you of</p> <p>12 defendants 1 through 15 in the Cyprus</p> <p>13 litigation?</p> <p>14 MR. TREMONTE: Objection.</p> <p>15 A. I'm sorry.</p> <p>16 Q. Are you any of defendants 1</p> <p>17 through 15 in the Cyprus litigation?</p> <p>18 A. I mean, my name is there.</p> <p>19 Q. You're Defendant 1; is that</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. What do you understand the</p> <p>23 paragraph that I just read to require</p> <p>24 of defendants 1 through 15?</p> <p>25 MR. TREMONTE: Objection.</p>

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21 (Pages 78 to 81)

Page 78	Page 80
<p>1 Janna Bullock</p> <p>2 So she's testified that she</p> <p>3 doesn't remember seeing this</p> <p>4 document.</p> <p>5 So you're asking her as she</p> <p>6 sits here right now, assuming that</p> <p>7 that is, in fact, an order of the</p> <p>8 court and that it's duly valid and</p> <p>9 separate and apart from any</p> <p>10 communications she's had with</p> <p>11 counsel, like what does she</p> <p>12 understand those words to mean?</p> <p>13 MS. DONOVAN: So I want to</p> <p>14 understand what she thinks this</p> <p>15 means right now, because while she</p> <p>16 might not have -- she cannot</p> <p>17 clearly recall, I want to see what</p> <p>18 awareness she has generally. And</p> <p>19 we're going to test that as we go.</p> <p>20 Q. So Ms. Bullock, what do you</p> <p>21 understand this to mean?</p> <p>22 A. Well, I understand that no</p> <p>23 assets could be sold in the amount of</p> <p>24 \$26 million.</p> <p>25 Q. Now, in August of 2012, did</p>	<p>1 Janna Bullock</p> <p>2 Q. Did you have assets in excess</p> <p>3 of \$26 million in March 2013?</p> <p>4 A. I don't know.</p> <p>5 Q. At any point between</p> <p>6 August 2012 and today, have you had</p> <p>7 assets in excess of \$26 million?</p> <p>8 A. Not personally.</p> <p>9 Q. And what do you mean, "not</p> <p>10 personally"?</p> <p>11 MR. TREMONTE: Objection.</p> <p>12 Go ahead; you can answer.</p> <p>13 A. Personally, I did not have</p> <p>14 those assets.</p> <p>15 Q. So the assets belong to</p> <p>16 someone or something else?</p> <p>17 MR. TREMONTE: Objection to</p> <p>18 form.</p> <p>19 A. Personally, I did not have</p> <p>20 assets in the amount of \$26 million.</p> <p>21 Q. So does that mean you don't</p> <p>22 have access to assets in excess of</p> <p>23 \$26 million?</p> <p>24 MR. TREMONTE: Objection.</p> <p>25 A. It means that I don't have</p>
Page 79	Page 81
<p>1 Janna Bullock</p> <p>2 you have assets in excess of</p> <p>3 \$26 million?</p> <p>4 A. No.</p> <p>5 Q. What was the value of your</p> <p>6 assets in August 2012?</p> <p>7 A. I don't know.</p> <p>8 Q. What approximately was the</p> <p>9 value of your assets in August 2012?</p> <p>10 MR. TREMONTE: Objection.</p> <p>11 A. I don't know.</p> <p>12 Q. Where would you obtain that</p> <p>13 information?</p> <p>14 A. I don't know.</p> <p>15 Q. If you wanted to see what</p> <p>16 your assets were worth in August 2012,</p> <p>17 where would you go to get that</p> <p>18 information?</p> <p>19 A. I wouldn't go anywhere.</p> <p>20 Q. That information is recorded</p> <p>21 nowhere?</p> <p>22 A. Mm hm.</p> <p>23 Q. Do you have assets in excess</p> <p>24 of \$26 million currently?</p> <p>25 A. No.</p>	<p>1 Janna Bullock</p> <p>2 assets in the amount of \$26 million.</p> <p>3 Q. Does any entity controlled by</p> <p>4 you have access to assets in excess of</p> <p>5 \$26 million.</p> <p>6 A. I don't control any assets.</p> <p>7 Q. Do you control any entities?</p> <p>8 A. No.</p> <p>9 MR. TREMONTE: Again, you're</p> <p>10 asking as of now?</p> <p>11 MS. DONOVAN: (Nonverbal</p> <p>12 gesture).</p> <p>13 MR. TREMONTE: You'll have to</p> <p>14 verbalize your answer for the</p> <p>15 court reporter.</p> <p>16 Q. So currently, you don't have</p> <p>17 control of any entities?</p> <p>18 A. No.</p> <p>19 Q. At any point since August</p> <p>20 2012, have you had control of any</p> <p>21 entities?</p> <p>22 A. I'm not good with dates or</p> <p>23 money. I don't know.</p> <p>24 Q. Now, Ms. Bullock, do you know</p> <p>25 what the word transfer means?</p>

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22 (Pages 82 to 85)

Page 82	Page 84
<p>1 JANNA BULLOCK</p> <p>2 A. Yes.</p> <p>3 MR. TREMONTE: Objection.</p> <p>4 Q. What does it mean?</p> <p>5 MR. TREMONTE: Objection.</p> <p>6 Q. I want your understanding of</p> <p>7 the word transfer.</p> <p>8 A. It's a movement.</p> <p>9 Q. Okay. Do you understand what</p> <p>10 the word donate means?</p> <p>11 MR. TREMONTE: Objection.</p> <p>12 A. Yes.</p> <p>13 Q. What do you understand donate</p> <p>14 to mean?</p> <p>15 A. That somebody -- it's the</p> <p>16 process of giving.</p> <p>17 Q. Do you understand what the</p> <p>18 word sell means?</p> <p>19 A. Yes.</p> <p>20 Q. What did you understand sell</p> <p>21 to mean?</p> <p>22 MR. TREMONTE: Objection.</p> <p>23 A. It's exchange. It's a</p> <p>24 transfer of ownership in exchange for</p> <p>25 money.</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. Do you know what the word</p> <p>3 alienate means?</p> <p>4 MR. TREMONTE: Objection.</p> <p>5 A. No.</p> <p>6 Q. Do you know what the word</p> <p>7 diminish means?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 A. Yes.</p> <p>10 Q. What does it mean?</p> <p>11 MR. TREMONTE: Objection.</p> <p>12 A. It's decrease in value.</p> <p>13 Q. Ms. Bullock, have you</p> <p>14 transferred any assets since August 14,</p> <p>15 2012?</p> <p>16 MR. TREMONTE: Objection.</p> <p>17 A. No.</p> <p>18 Q. Let me ask you, Ms. Bullock,</p> <p>19 what do you understand asset to mean?</p> <p>20 MR. TREMONTE: Objection.</p> <p>21 A. Anything of value.</p> <p>22 Q. Have you transferred any</p> <p>23 assets since March 6, 2013?</p> <p>24 MR. TREMONTE: Objection.</p> <p>25 A. Not that I remember.</p>
Page 83	Page 85
<p>1 JANNA BULLOCK</p> <p>2 Q. Do you know what the word</p> <p>3 convey means?</p> <p>4 MR. TREMONTE: Objection.</p> <p>5 A. No.</p> <p>6 Q. Do you understand what the</p> <p>7 word charge means?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 A. Yes.</p> <p>10 Q. What do you understand charge</p> <p>11 to mean?</p> <p>12 MR. TREMONTE: Objection.</p> <p>13 A. It's put something with</p> <p>14 power.</p> <p>15 Q. Excuse me?</p> <p>16 A. It's enforce something with</p> <p>17 power.</p> <p>18 Q. Do you know what the word</p> <p>19 mortgage means?</p> <p>20 MR. TREMONTE: Objection.</p> <p>21 A. Yes.</p> <p>22 Q. What does mortgage mean?</p> <p>23 MR. TREMONTE: Objection.</p> <p>24 A. It's a loan that is</p> <p>25 guaranteed by the real estate.</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. And you testified that</p> <p>3 transfer was a movement, correct?</p> <p>4 A. Yes.</p> <p>5 Q. So it's your testimony that</p> <p>6 you have not moved any asset since</p> <p>7 August 14, 2012?</p> <p>8 A. Not personally.</p> <p>9 Q. And you keep saying not</p> <p>10 personally --</p> <p>11 MR. TREMONTE: Objection.</p> <p>12 Q. What do you mean by that?</p> <p>13 A. Personally, I did not move</p> <p>14 anything that I owned.</p> <p>15 Q. Has anyone moved anything</p> <p>16 that you owned?</p> <p>17 A. No.</p> <p>18 Q. Ms. Bullock, have you donated</p> <p>19 any assets since August 14, 2012?</p> <p>20 MR. TREMONTE: Objection.</p> <p>21 A. No.</p> <p>22 Q. No time in the last five, six</p> <p>23 years you've made a donation?</p> <p>24 MR. TREMONTE: Objection.</p> <p>25 A. I don't know. Not that I</p>

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23 (Pages 86 to 89)

<p style="text-align: right;">Page 86</p> <p>1 JANNA BULLOCK</p> <p>2 recall.</p> <p>3 Q. Ms. Bullock, have you sold</p> <p>4 any assets since August 14, 2012?</p> <p>5 A. I don't own anything to sell.</p> <p>6 Q. Have you charged any assets</p> <p>7 since August 14, 2012?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 A. Charged? I don't understand</p> <p>10 what it means in this connection.</p> <p>11 Q. So earlier when I asked if</p> <p>12 you understood what charge meant --</p> <p>13 A. And I gave description what I</p> <p>14 mean by charge, give something with</p> <p>15 power. So I do not know.</p> <p>16 Q. Have you given anything with</p> <p>17 power since August 2012, under your</p> <p>18 understanding of the word charged?</p> <p>19 A. I don't know.</p> <p>20 Q. Have you mortgaged any assets</p> <p>21 since August 14, 2012?</p> <p>22 A. I don't remember.</p> <p>23 Q. If you wanted to find the</p> <p>24 answer to that question, what sources</p> <p>25 of information would you look to?</p>	<p style="text-align: right;">Page 88</p> <p>1 JANNA BULLOCK</p> <p>2 MR. TREMONTE: I'm sorry can</p> <p>3 you read back the question?</p> <p>4 Was the question have you</p> <p>5 diminished any assets?</p> <p>6 MS. DONOVAN: Yes.</p> <p>7 Q. Have you diminished the value</p> <p>8 of any assets since August 14, 2012?</p> <p>9 A. I don't know.</p> <p>10 Q. And if you wanted to see</p> <p>11 whether you had diminished the value of</p> <p>12 any assets, what sources of information</p> <p>13 could you consult?</p> <p>14 A. I don't know.</p> <p>15 Q. Are there any documents you</p> <p>16 could consult?</p> <p>17 A. I don't know.</p> <p>18 Q. Are there any people you</p> <p>19 could consult?</p> <p>20 A. Not that I know.</p> <p>21 Q. Don't tell me the substance</p> <p>22 of any communication, just answer the</p> <p>23 question yes or no.</p> <p>24 Have you consulted with</p> <p>25 lawyers about the proceeding in Cyprus?</p>
<p style="text-align: right;">Page 87</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't have any sources.</p> <p>3 MR. TREMONTE: Objection.</p> <p>4 You can answer.</p> <p>5 A. I don't have any sources of</p> <p>6 information.</p> <p>7 Q. So if you wanted to check</p> <p>8 whether you had obtained any mortgages,</p> <p>9 there are no information sources you</p> <p>10 could go to?</p> <p>11 A. Probably not.</p> <p>12 Q. So no documents that you</p> <p>13 could consult?</p> <p>14 A. No.</p> <p>15 Q. No people you could speak to?</p> <p>16 A. No. There was one person,</p> <p>17 but I'm not speaking with him anymore.</p> <p>18 Q. And who was that?</p> <p>19 A. His name was Stuart Smith.</p> <p>20 Q. Have you diminished the value</p> <p>21 of any assets since August 14, 2012?</p> <p>22 MR. TREMONTE: Objection.</p> <p>23 A. I don't know.</p> <p>24 Q. Excuse me, that was?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 89</p> <p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. So Ms. Bullock, go back to</p> <p>4 the document that's Exhibit 2 which is</p> <p>5 the document subpoena. And please</p> <p>6 turn -- it's labeled Page 5 at the</p> <p>7 bottom. But it's probably around Page</p> <p>8 8 in the handout. I meant Page 4. So</p> <p>9 go a bit further.</p> <p>10 Actually, if I might,</p> <p>11 Ms. Bullock, it's this one which is 2.</p> <p>12 A. Okay.</p> <p>13 Q. You'll see it, the bottom</p> <p>14 middle, little four.</p> <p>15 A. So you'll recall this is the</p> <p>16 document subpoena that you received in</p> <p>17 this litigation here in the Southern</p> <p>18 District of New York.</p> <p>19 Do you understand that?</p> <p>20 MR. TREMONTE: Objection.</p> <p>21 Asked and answered.</p> <p>22 MS. DONOVAN: I just want to</p> <p>23 confirm that she's aware of the</p> <p>24 document she's looking at.</p> <p>25 MR. TREMONTE: May, I?</p>

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24 (Pages 90 to 93)

<p style="text-align: right;">Page 90</p> <p>1 JANNA BULLOCK</p> <p>2 Janna, do you remember this</p> <p>3 to be the subpoena that you</p> <p>4 received in connection with this</p> <p>5 matter?</p> <p>6 THE WITNESS: Yes.</p> <p>7 MR. TREMONTE: Yes. Okay.</p> <p>8 Q. So look at the requested</p> <p>9 document number one.</p> <p>10 A. Mm hm.</p> <p>11 Q. Now, Ms. Bullock, what do you</p> <p>12 understand document request one to have</p> <p>13 requested of you?</p> <p>14 MR. TREMONTE: Objection to</p> <p>15 form.</p> <p>16 A. That they have to provide</p> <p>17 location of the assets and ownership of</p> <p>18 the assets and so on.</p> <p>19 Q. So where it says documents</p> <p>20 sufficient to comply with paragraph two</p> <p>21 of the freezing and disclosure order.</p> <p>22 What do you understand it to</p> <p>23 mean by the freezing and disclosure</p> <p>24 order?</p> <p>25 MR. TREMONTE: Objection to</p>	<p style="text-align: right;">Page 92</p> <p>1 JANNA BULLOCK</p> <p>2 action number 3573, back slash, 2012,</p> <p>3 with which you were personally served</p> <p>4 on April 24, 2013.</p> <p>5 Ms. Bullock can you confirm</p> <p>6 that that's the document that is</p> <p>7 Exhibit 3?</p> <p>8 MR. TREMONTE: Objection.</p> <p>9 A. I don't think I was served</p> <p>10 with anything on March 3rd, 2013.</p> <p>11 MR. TREMONTE: Janna, that's</p> <p>12 not the question.</p> <p>13 The question is, can you</p> <p>14 confirm that the document that</p> <p>15 counsel was just reading from is,</p> <p>16 in fact, the document marked</p> <p>17 Exhibit Number 3.</p> <p>18 She's just asking about the</p> <p>19 documents in front of you, whether</p> <p>20 what she just read is Exhibit 3.</p> <p>21 That's all she's asking.</p> <p>22 A. I don't know.</p> <p>23 Q. So take a look at Exhibit 3.</p> <p>24 Now, what's marked Page 3 of</p> <p>25 17 at the top. So three pages in.</p>
<p style="text-align: right;">Page 91</p> <p>1 JANNA BULLOCK</p> <p>2 form.</p> <p>3 A. Something we just read</p> <p>4 before.</p> <p>5 Q. Do you have an understanding</p> <p>6 what it means by the freezing and</p> <p>7 disclosure order?</p> <p>8 A. Yes.</p> <p>9 Q. And you said it's something</p> <p>10 we just read before.</p> <p>11 Which something are you</p> <p>12 referring to?</p> <p>13 A. The order on the other page.</p> <p>14 Q. Could you identify by exhibit</p> <p>15 number which document you're referring</p> <p>16 to?</p> <p>17 MR. TREMONTE: Objection.</p> <p>18 A. It's Exhibit 5.</p> <p>19 Q. Ms. Bullock, turn one page</p> <p>20 back in the document subpoena. This</p> <p>21 one (indicating). All right.</p> <p>22 Paragraph 12, the freezing</p> <p>23 and disclosure order shall mean the</p> <p>24 order issued on March 6, 2013, at the</p> <p>25 District Court of Limassol in Cyprus,</p>	<p style="text-align: right;">Page 93</p> <p>1 JANNA BULLOCK</p> <p>2 There's a paragraph two, Ms. Bullock.</p> <p>3 And that requires an affidavit</p> <p>4 disclosing all assets exceeding 10,000</p> <p>5 Euros. And then it continues.</p> <p>6 But just generally, did you</p> <p>7 understand that you were required to</p> <p>8 produce an affidavit in the Cyprus</p> <p>9 litigation to disclosing all assets in</p> <p>10 excess of 10,000 Euros?</p> <p>11 MR. TREMONTE: Objection.</p> <p>12 A. Well, this is what I see</p> <p>13 right now.</p> <p>14 Q. So putting aside what was</p> <p>15 required in Cyprus.</p> <p>16 Did you understand that in</p> <p>17 response to the document subpoena you</p> <p>18 received in this case in New York, that</p> <p>19 you were required to provide documents</p> <p>20 sufficient to comply with that</p> <p>21 paragraph of the Cyprus court order?</p> <p>22 A. I don't know.</p> <p>23 Q. Ms. Bullock, in your</p> <p>24 production of documents in response to</p> <p>25 this subpoena in the Southern District</p>

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25 (Pages 94 to 97)

Page 94	Page 96
<p>1 JANNA BULLOCK</p> <p>2 of New York, did you produce documents</p> <p>3 disclosing all assets that you have in</p> <p>4 excess of 10,000 Euros?</p> <p>5 A. I reproduced everything that</p> <p>6 was required.</p> <p>7 Q. Now, Ms. Bullock, it's your</p> <p>8 testimony that you provided the</p> <p>9 specific location of each asset?</p> <p>10 MR. TREMONTE: Objection to</p> <p>11 form.</p> <p>12 A. Yes.</p> <p>13 Q. When you say, we produced</p> <p>14 everything that was required, what did</p> <p>15 you understand to be required?</p> <p>16 MR. TREMONTE: Objection.</p> <p>17 And you know, again, to the extent</p> <p>18 that --</p> <p>19 A. I think I answered this</p> <p>20 question before.</p> <p>21 MR. TREMONTE: Okay. And I</p> <p>22 made an objection. But to the</p> <p>23 extent that you had conversations</p> <p>24 with your lawyers, including us,</p> <p>25 okay -- they don't want to know</p>	<p>1 JANNA BULLOCK</p> <p>2 that's been before Judge Sullivan?</p> <p>3 MR. TREMONTE: Objection.</p> <p>4 Caroline, can I take a stab</p> <p>5 at this? Just a quick voir dire.</p> <p>6 EXAMINATION BY</p> <p>7 MR. TREMONTE:</p> <p>8 Q. You understand that this</p> <p>9 subpoena was served on you -- the</p> <p>10 subpoena that is marked Exhibit 2, was</p> <p>11 served on you in connection with this</p> <p>12 action in the southern district,</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And again, without</p> <p>16 getting into communication with</p> <p>17 counsel, based on your consultation</p> <p>18 with counsel and your review of the</p> <p>19 subpoena, you understood that you had</p> <p>20 to comply with all of its terms,</p> <p>21 correct?</p> <p>22 A. Right.</p> <p>23 Q. Okay. Directing your</p> <p>24 attention to Page 4 where it says,</p> <p>25 requested documents. Please turn to</p>
Page 95	Page 97
<p>1 JANNA BULLOCK</p> <p>2 about the substance of those</p> <p>3 communications. She's just asking</p> <p>4 you, did you have a</p> <p>5 general understanding as to what</p> <p>6 -- I think she's asking, did you</p> <p>7 have a general understanding as to</p> <p>8 what was required to be produced?</p> <p>9 A. Yes.</p> <p>10 Q. What was required to be</p> <p>11 produced?</p> <p>12 A. Assets that I own in the</p> <p>13 amount of \$26 million.</p> <p>14 Q. Why do you say \$26 million?</p> <p>15 A. Because that's what is</p> <p>16 listed.</p> <p>17 Q. And you're referring here to</p> <p>18 the Cyprus court freezing order?</p> <p>19 A. Yes.</p> <p>20 Q. Let's stay on the document</p> <p>21 that is the document subpoena in the</p> <p>22 New York case.</p> <p>23 What did you understand to be</p> <p>24 required for production in this case?</p> <p>25 So Southern District of New York, the</p>	<p>1 JANNA BULLOCK</p> <p>2 that page of the subpoena.</p> <p>3 MR. TREMONTE: Mark, can you</p> <p>4 help, Page 4 of the subpoena.</p> <p>5 Okay.</p> <p>6 Q. Directing your attention to</p> <p>7 where it says, requested documents.</p> <p>8 Can you point to those words,</p> <p>9 please. Just point to the words,</p> <p>10 requested documents. Sort of in the</p> <p>11 middle of the lower part of the page.</p> <p>12 It's underlined and in bold.</p> <p>13 Do you see that? I'll point</p> <p>14 you. It says requested documents.</p> <p>15 A. Okay.</p> <p>16 Q. And you see there's a number</p> <p>17 1 and then there's some words?</p> <p>18 A. Mm hm.</p> <p>19 Q. Did you have an understanding</p> <p>20 that everything, all of the words</p> <p>21 there, everything that's listed there</p> <p>22 after requested documents described the</p> <p>23 things that you had to produce?</p> <p>24 Did you understand that?</p> <p>25 After consulting with counsel</p>

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26 (Pages 98 to 101)

<p style="text-align: right;">Page 98</p> <p>1 JANNA BULLOCK</p> <p>2 you, understood that you had to produce</p> <p>3 the documents listed in this subpoena,</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. To the extent that you had</p> <p>7 any, right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And that includes</p> <p>10 little paragraph one here on Page 4,</p> <p>11 the specific location of the assets to</p> <p>12 the extent that you had any, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And it includes little</p> <p>15 romanette 2, whether the assets belong</p> <p>16 to you exclusively or jointly, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And you understand that</p> <p>19 exclusively means something that just</p> <p>20 belongings to you, right?</p> <p>21 A. Yes.</p> <p>22 Q. And you understand that</p> <p>23 jointly means something that you own</p> <p>24 with someone or some other entity?</p> <p>25 A. Yes, I do.</p>	<p style="text-align: right;">Page 100</p> <p>1 JANNA BULLOCK</p> <p>2 understanding that things that had to</p> <p>3 be produced, correct?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And you went through</p> <p>6 the little romanettes 1 through 4, and</p> <p>7 you answered yes, you understood that</p> <p>8 you were to produce the specific</p> <p>9 location of each asset, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And it's your</p> <p>12 understanding that what was produced in</p> <p>13 your document production provided the</p> <p>14 specific location of the assets?</p> <p>15 A. Yes.</p> <p>16 MR. TREMONTE: Objection.</p> <p>17 To the extent that you had</p> <p>18 any.</p> <p>19 A. Yes.</p> <p>20 Q. And you testified in response</p> <p>21 to your counsel's questioning that you</p> <p>22 understood the word exclusively to mean</p> <p>23 belonging solely to you, correct?</p> <p>24 A. Mm hm.</p> <p>25 MR. TREMONTE: Objection to</p>
<p style="text-align: right;">Page 99</p> <p>1 JANNA BULLOCK</p> <p>2 Q. And romanette 3, whether the</p> <p>3 assets are held in trust or through</p> <p>4 another form of ownership.</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. You understood you had to</p> <p>8 produce any document --</p> <p>9 A. Yes.</p> <p>10 Q. If you had them,</p> <p>11 responsive --</p> <p>12 A. Right.</p> <p>13 Q. And isn't that also true of</p> <p>14 everything written on --</p> <p>15 MS. DONOVAN: I'll take it</p> <p>16 from here.</p> <p>17 MR. TREMONTE: Okay.</p> <p>18 EXAMINATION BY</p> <p>19 MS. DONOVAN:</p> <p>20 Q. So Ms. Bullock, go back to</p> <p>21 Page 4. So the page that you were just</p> <p>22 looking at. And as your counsel was</p> <p>23 walking you through the requirements of</p> <p>24 the subpoena, you answered in response</p> <p>25 to his questions that you had an</p>	<p style="text-align: right;">Page 101</p> <p>1 JANNA BULLOCK</p> <p>2 form.</p> <p>3 Go ahead.</p> <p>4 Q. Ms. Bullock.</p> <p>5 A. Yes.</p> <p>6 Q. Now, what did you understand</p> <p>7 jointly to mean, Ms. Bullock?</p> <p>8 A. That I owned it with somebody</p> <p>9 else.</p> <p>10 Q. Okay. What assets do you own</p> <p>11 with somebody else?</p> <p>12 A. None.</p> <p>13 Q. You own no assets with anyone</p> <p>14 else?</p> <p>15 Not your daughter?</p> <p>16 A. No.</p> <p>17 Q. Not your mother?</p> <p>18 A. No.</p> <p>19 Q. Not your ex-husband?</p> <p>20 A. No.</p> <p>21 Q. Now, what do you understand</p> <p>22 it to mean by held in trust?</p> <p>23 A. That somebody owned -- that</p> <p>24 trust owned something for me.</p> <p>25 Q. It says any other form of</p>

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27 (Pages 102 to 105)

Page 102	Page 104
<p>1 JANNA BULLOCK</p> <p>2 ownership.</p> <p>3 What do you understand it to</p> <p>4 mean by another form of ownership?</p> <p>5 A. I don't know other forms of</p> <p>6 ownership.</p> <p>7 Q. So you understand that</p> <p>8 there's ownership by you personally, or</p> <p>9 ownership by a trust?</p> <p>10 A. Yes.</p> <p>11 Q. And you testified that you</p> <p>12 hold some assets in trust, correct?</p> <p>13 MR. CUCCARO: Objection.</p> <p>14 A. No.</p> <p>15 Q. You testified earlier that</p> <p>16 that you had three trusts established,</p> <p>17 correct?</p> <p>18 A. Right.</p> <p>19 MR. TREMONTE: Objection.</p> <p>20 Q. And now, in romanette 4, it</p> <p>21 says, whether the assets are held</p> <p>22 directly by you.</p> <p>23 What do you understand that</p> <p>24 to mean, directly by you?</p> <p>25 A. That they are under my name.</p>	<p>1 JANNA BULLOCK</p> <p>2 MR. TREMONTE: Objection to</p> <p>3 form.</p> <p>4 Q. Ms. Bullock, the apartment</p> <p>5 that you listed in response to the</p> <p>6 court reporter's question for an</p> <p>7 address, do you own that apartment?</p> <p>8 A. No.</p> <p>9 Q. Who owns that apartment?</p> <p>10 A. This apartment is in a trust.</p> <p>11 Q. What trust is that apartment</p> <p>12 in?</p> <p>13 A. I don't even know.</p> <p>14 Q. Who established that trust?</p> <p>15 MR. TREMONTE: Objection to</p> <p>16 form.</p> <p>17 A. This trust was established</p> <p>18 really long time ago.</p> <p>19 Q. How do you have an</p> <p>20 understanding of -- strike that.</p> <p>21 How did you come to this</p> <p>22 understanding that the apartment you</p> <p>23 live in is held in a trust?</p> <p>24 A. I never owned this apartment.</p> <p>25 Q. No, what I'm asking is how</p>
Page 103	Page 105
<p>1 JANNA BULLOCK</p> <p>2 Q. And then when it says, or</p> <p>3 indirectly through other natural or</p> <p>4 legal entities, what did you understand</p> <p>5 that to mean?</p> <p>6 A. That assets that are owned on</p> <p>7 my behalf by someone else.</p> <p>8 Q. Are there any assets owned on</p> <p>9 your behalf by someone else?</p> <p>10 A. No.</p> <p>11 Q. So all assets that you own</p> <p>12 are held in your name?</p> <p>13 A. I don't own anything.</p> <p>14 MR. TREMONTE: Objection to</p> <p>15 form.</p> <p>16 Q. Ms. Bullock, are all assets</p> <p>17 that you own held in your name?</p> <p>18 MR. TREMONTE: Objection to</p> <p>19 form.</p> <p>20 A. I don't own anything.</p> <p>21 Q. You say you don't own</p> <p>22 anything. You earlier gave me your</p> <p>23 understanding of the word assets which</p> <p>24 are things of value; is that correct?</p> <p>25 A. Yes.</p>	<p>1 JANNA BULLOCK</p> <p>2 you know now, sitting here, that this</p> <p>3 apartment in New York where you live is</p> <p>4 primarily held in a trust?</p> <p>5 A. Because it is in a trust.</p> <p>6 Q. How do you know that?</p> <p>7 A. That's what I was told.</p> <p>8 Q. Who told you that?</p> <p>9 A. A trust attorney who put it</p> <p>10 in there.</p> <p>11 Q. And who is that attorney?</p> <p>12 A. I don't remember now.</p> <p>13 Q. When did you speak with this</p> <p>14 trust attorney?</p> <p>15 A. I didn't speak with him.</p> <p>16 Q. Who spoke with this attorney</p> <p>17 on your behalf?</p> <p>18 MR. TREMONTE: Objection to</p> <p>19 form.</p> <p>20 A. No one spoke to him on my</p> <p>21 behalf.</p> <p>22 Q. Did you ever at any point in</p> <p>23 time own the apartment in New York in</p> <p>24 which you now live?</p> <p>25 A. No. Never.</p>

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28 (Pages 106 to 109)

Page 106

1 JANNA BULLOCK
 2 Q. And it's your testimony
 3 that's always been held in a trust?
 4 A. Yes.
 5 MR. TREMONTE: Objection to
 6 form.
 7 Q. And you're not aware of the
 8 identity of this trust.
 9 A. No.
 10 Q. You don't know its name?
 11 A. No.
 12 Q. Do you know any of its
 13 trustees?
 14 A. No.
 15 Q. Do you know if it has
 16 trustees?
 17 A. I'm not involved in that.
 18 Q. Do you know if there are any
 19 beneficiaries of the trust?
 20 A. I don't know. No.
 21 THE WITNESS: Can I get some
 22 water?
 23 MR. TREMONTE: It's 1:00 --
 24 MS. DONOVAN: We can break.
 25 We can go off.

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1 JANNA BULLOCK
 2 THE VIDEOGRAPHER: The time
 3 is approximately 1:00 p.m.
 4 This will end Media Unit
 5 Number 2, and we are going off the
 6 record.
 7 (Whereupon, a lunch break was
 8 taken at this time.)
 9 THE VIDEOGRAPHER: The time
 10 is approximately 1:55 p.m.
 11 This is the start of Media
 12 Unit Number 3, and we're back on
 13 the record.
 14 Q. Did you have income in the
 15 year 2017?
 16 A. No.
 17 Q. You testified that you
 18 complete your own tax returns, that's
 19 right?
 20 A. Not for 2017 yet.
 21 Q. For 2016, did you declare
 22 income on your tax return?
 23 A. I don't remember.
 24 Q. Do you recall working during
 25 the 2016 year?

Page 108

1 JANNA BULLOCK
 2 A. No.
 3 Q. Did you operate a business in
 4 2016?
 5 A. No.
 6 Q. Did you operate a business in
 7 2017?
 8 A. No.
 9 Q. Did you -- were you employed
 10 in 2016?
 11 A. No.
 12 Q. Were you employed in 2015?
 13 A. No.
 14 Q. Were you employed in 2014?
 15 A. No.
 16 Q. Were you employed in 2013?
 17 A. I don't remember. I might.
 18 Q. And the same questions as to
 19 operating a business.
 20 Did you operate a business in
 21 2015?
 22 A. No.
 23 Q. Did you operate a business in
 24 2014?
 25 A. No.

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1 JANNA BULLOCK
 2 Q. Did you operate a business in
 3 2013?
 4 A. I don't remember.
 5 Q. In 2014, did you declare any
 6 income on your tax returns?
 7 A. I don't remember.
 8 Q. In 2015, did you declare any
 9 income?
 10 A. Tax returns have been
 11 prepared by professionals. I don't
 12 remember.
 13 Q. Who prepared your tax return?
 14 A. I don't remember.
 15 Q. Did you engage a law --
 16 excuse me -- did you engage a
 17 professional services firm to prepare
 18 your tax returns?
 19 A. Yes. They were prepared by
 20 my tax attorney.
 21 Q. And that's Stuart Smith?
 22 A. Yes.
 23 Q. For what time period did a
 24 professional firm prepare your tax
 25 returns?

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29 (Pages 110 to 113)

Page 110	Page 112
<p>1 JANNA BULLOCK</p> <p>2 A. Always.</p> <p>3 Q. In 2014, did you receive any</p> <p>4 investment income?</p> <p>5 A. No.</p> <p>6 Q. In 2015, did you receive any</p> <p>7 investment income?</p> <p>8 A. No.</p> <p>9 Q. In 2016, did you receive any</p> <p>10 investment income?</p> <p>11 A. No.</p> <p>12 Q. Ms. Bullock, do you review</p> <p>13 your own tax returns?</p> <p>14 A. I don't remember.</p> <p>15 Q. Are you aware if any income</p> <p>16 was declared on any tax return after</p> <p>17 2013?</p> <p>18 A. I don't remember.</p> <p>19 Q. Ms. Bullock, where do you</p> <p>20 file tax returns?</p> <p>21 A. They get filed by</p> <p>22 professionals.</p> <p>23 Q. Do you know in what</p> <p>24 jurisdictions?</p> <p>25 A. I don't know about</p>	<p>1 JANNA BULLOCK</p> <p>2 hotels at some point.</p> <p>3 Q. What does it mean to be a</p> <p>4 g�rant of the French hotels?</p> <p>5 A. Just a manager.</p> <p>6 Q. So it's like a manager or</p> <p>7 director of a corporation?</p> <p>8 A. More of a manager.</p> <p>9 Q. Okay. And when you were</p> <p>10 referencing the French hotels, which</p> <p>11 hotels are those?</p> <p>12 A. These are Pralong and</p> <p>13 Crystal.</p> <p>14 Q. Are you the beneficial owner</p> <p>15 of the Hotel Pralong?</p> <p>16 A. No.</p> <p>17 Q. Are you the beneficial owner</p> <p>18 of the Hotel Crystal?</p> <p>19 A. No.</p> <p>20 Q. Have you at any time been the</p> <p>21 beneficial owner of the Hotel Pralong?</p> <p>22 A. No.</p> <p>23 Q. Have you at any time been the</p> <p>24 beneficial owner of the Hotel Crystal?</p> <p>25 A. No.</p>
Page 111	Page 113
<p>1 JANNA BULLOCK</p> <p>2 jurisdictions.</p> <p>3 Q. Do you file federal tax</p> <p>4 returns?</p> <p>5 A. Whatever needs to be filed is</p> <p>6 filed.</p> <p>7 Q. Did you sign your own tax</p> <p>8 returns?</p> <p>9 A. I think they filed</p> <p>10 electronically now.</p> <p>11 Q. And to confirm, you do or</p> <p>12 don't review them before they're filed?</p> <p>13 A. I don't know. I do whatever</p> <p>14 I'm asked to do.</p> <p>15 Q. Did you recall ever reviewing</p> <p>16 a tax return prepared for you?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And do you recall if</p> <p>19 there was any income declared on that</p> <p>20 tax return?</p> <p>21 A. I was getting salary at some</p> <p>22 point.</p> <p>23 Q. At what point were you</p> <p>24 getting salary?</p> <p>25 A. I was a g�rant of the French</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. And Ms. Bullock, if you</p> <p>3 wanted to determine the identity of the</p> <p>4 firm that prepared your tax returns,</p> <p>5 where would you obtain that</p> <p>6 information?</p> <p>7 A. I don't remember their names.</p> <p>8 Q. How would you find out their</p> <p>9 names?</p> <p>10 A. I have to probably call</p> <p>11 somebody.</p> <p>12 Q. Who would you have to call?</p> <p>13 A. I will call my lawyer.</p> <p>14 Q. And who is that?</p> <p>15 A. I will call Stuart Smith.</p> <p>16 Q. Do you keep any records in</p> <p>17 connection with the preparation of your</p> <p>18 own tax returns?</p> <p>19 A. No.</p> <p>20 Q. Ms. Bullock, do you keep cash</p> <p>21 on hand?</p> <p>22 A. No.</p> <p>23 Q. Ms. Bullock, do you have any</p> <p>24 bank accounts?</p> <p>25 A. No.</p>

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30 (Pages 114 to 117)

Page 114

1 JANNA BULLOCK
 2 Q. Do you have a debit card?
 3 A. No.
 4 Q. Ms. Bullock, when you need
 5 cash for everyday purposes, how do you
 6 get that cash?
 7 A. I ask my --
 8 MR. CUCCARO: Objection to
 9 form.
 10 You can answer.
 11 A. I ask my mom.
 12 Q. And your mother's name is?
 13 What is your mother's name?
 14 A. [REDACTED]
 15 Q. Her last name?
 16 A. [REDACTED]
 17 Q. Does your mother live with
 18 you?
 19 A. Yes.
 20 Q. And your mother has bank
 21 accounts?
 22 A. I don't know.
 23 Q. So in any instance where you
 24 need cash, you go to your mother?
 25 A. I go to my daughter too.

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1 JANNA BULLOCK
 2 Q. Do you have any credit cards,
 3 Ms. Bullock?
 4 A. No.
 5 Q. Do you have any charge cards?
 6 A. No.
 7 Q. Do you ever go out to dinner
 8 with friends?
 9 A. I go.
 10 Q. Yes or no, do you go out to
 11 dinner with friends?
 12 A. Yes.
 13 Q. In those instances, do you
 14 occasionally pay?
 15 A. Sometimes I do.
 16 Q. How do you pay?
 17 A. I have cash.
 18 Q. Okay. And where do you get
 19 that cash?
 20 A. I ask my mom or my daughter.
 21 Q. Does your daughter live with
 22 you?
 23 A. Yes.
 24 Q. Do you all live in the same
 25 apartment? I believe it was the

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1 JANNA BULLOCK
 2 Q. Do you know where your mother
 3 maintains bank accounts?
 4 A. No.
 5 Q. Do you know where your mother
 6 takes out cash in the City of New York?
 7 A. No.
 8 Q. You've never been with her
 9 when she's taken out cash from an ATM?
 10 A. No.
 11 Q. Do you know if your daughter
 12 maintains bank accounts?
 13 A. I don't know.
 14 Q. Have you been with your
 15 daughter at any point when she's taken
 16 out cash?
 17 A. No.
 18 Q. So whenever you've gotten
 19 cash from your mother or your daughter,
 20 they've just had it on hand?
 21 MR. CUCCARO: Objection to
 22 form.
 23 Q. I'll remind you you're under
 24 oath.
 25 A. Right.

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1 JANNA BULLOCK
 2 penthouse.
 3 A. We live in the same building.
 4 Q. What unit is your daughter
 5 in?
 6 A. [REDACTED]
 7 Q. Excuse me?
 8 A. [REDACTED]
 9 Q. Are eight?
 10 A. [REDACTED]
 11 Q. [REDACTED]
 12 A. Mm hm.
 13 Q. And in what unit is your
 14 mother?
 15 A. [REDACTED]
 16 Q. [REDACTED]
 17 A. Mm hm.
 18 Q. Does your mother own her
 19 apartment?
 20 A. I don't know.
 21 Q. Did you assist your with
 22 purchasing her apartment?
 23 A. I don't remember.
 24 Q. When did your mother purchase
 25 her apartment?

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31 (Pages 118 to 121)

<p style="text-align: right;">Page 118</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't remember.</p> <p>3 Q. When did your mother begin</p> <p>4 living in the unit, [REDACTED]</p> <p>5 A. I don't remember.</p> <p>6 Q. Remind me the address on your</p> <p>7 current apartment is? Street and</p> <p>8 number?</p> <p>9 A. [REDACTED]</p> <p>10 Q. When did you first move to</p> <p>11 [REDACTED]</p> <p>12 A. I believe it was probably the</p> <p>13 year 2000.</p> <p>14 Q. And did you move into the</p> <p>15 penthouse at that time?</p> <p>16 A. I moved in a different</p> <p>17 apartment.</p> <p>18 Q. Speak up.</p> <p>19 A. I moved in a different</p> <p>20 apartment.</p> <p>21 Q. And then what was that</p> <p>22 apartment that you initially moved</p> <p>23 into?</p> <p>24 A. [REDACTED]</p> <p>25 Q. Did you purchase [REDACTED]</p>	<p style="text-align: right;">Page 120</p> <p>1 JANNA BULLOCK</p> <p>2 of different issues.</p> <p>3 Q. Can you give me some</p> <p>4 examples, please?</p> <p>5 A. Mostly, my ex-husband's</p> <p>6 troubles in Russia.</p> <p>7 Q. Did he assist you with any</p> <p>8 real estate transactions in the US?</p> <p>9 A. No.</p> <p>10 Q. When you say he assisted you</p> <p>11 with your husband's troubles in Russia,</p> <p>12 is that the point in time where you put</p> <p>13 assets in trust?</p> <p>14 A. No.</p> <p>15 Q. Ms. Bullock, do you use</p> <p>16 QuickBooks?</p> <p>17 A. No.</p> <p>18 Q. Do you know if any</p> <p>19 accountants of yours have used</p> <p>20 QuickBooks?</p> <p>21 A. I don't know.</p> <p>22 Q. Have you ever consulted a</p> <p>23 record from an accountant that was</p> <p>24 generated on QuickBooks?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 119</p> <p>1 JANNA BULLOCK</p> <p>2 Did you purchase Apartment</p> <p>3 [REDACTED]</p> <p>4 A. That apartment was in a</p> <p>5 trust.</p> <p>6 Q. What trust?</p> <p>7 A. I don't remember.</p> <p>8 Q. Who handled the formation of</p> <p>9 the trust?</p> <p>10 A. An attorney.</p> <p>11 Q. Which attorney?</p> <p>12 A. Samuel Pisar.</p> <p>13 Q. Last name is spelled how?</p> <p>14 A. P-I-S-A-R.</p> <p>15 Q. Do you still work with an</p> <p>16 attorney, Samuel Pisar?</p> <p>17 A. Not anymore.</p> <p>18 Q. Was he then located or</p> <p>19 working in New York?</p> <p>20 A. Yes.</p> <p>21 Q. Did you work with Mr. Pisar</p> <p>22 with respect to any other transactions?</p> <p>23 A. Yes.</p> <p>24 Q. Which?</p> <p>25 A. He assisted me a lot in a lot</p>	<p style="text-align: right;">Page 121</p> <p>1 JANNA BULLOCK</p> <p>2 Q. Now, Ms. Bullock, do you</p> <p>3 currently have any Money Market</p> <p>4 accounts?</p> <p>5 A. No.</p> <p>6 Q. And have you had any Money</p> <p>7 Market accounts at any time since</p> <p>8 August 2012?</p> <p>9 A. No.</p> <p>10 Q. I'm going to reask with</p> <p>11 respect to bank accounts.</p> <p>12 Do you currently have any</p> <p>13 bank accounts?</p> <p>14 MR. CUCCARO: Objection.</p> <p>15 Asked and answered.</p> <p>16 A. No.</p> <p>17 Q. And do you understand --</p> <p>18 so strike that.</p> <p>19 When I'm saying bank</p> <p>20 accounts, I'm talking about commercial</p> <p>21 retail banking like a Bank of America</p> <p>22 or, you know, even a Wells Fargo.</p> <p>23 Do you have any commercial</p> <p>24 retail bank accounts?</p> <p>25 A. I do not.</p>

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32 (Pages 122 to 125)

Page 122	Page 124
<p>1 JANNA BULLOCK</p> <p>2 Q. And have you had any at any</p> <p>3 point in time since August 2012?</p> <p>4 A. I had an account at Citibank.</p> <p>5 It was closed.</p> <p>6 Q. When did you have that</p> <p>7 Citibank account?</p> <p>8 A. I opened this account in</p> <p>9 1991.</p> <p>10 Q. When did you close it?</p> <p>11 A. The bank closed it.</p> <p>12 Q. When did the bank close it?</p> <p>13 A. Around this time.</p> <p>14 Q. Around 19 --</p> <p>15 A. I don't remember. But around</p> <p>16 that time.</p> <p>17 Q. So the home where you live</p> <p>18 currently, that's held in trust,</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. Are there any condo fees that</p> <p>22 you pay in connection with that</p> <p>23 apartment?</p> <p>24 A. I don't pay any fees.</p> <p>25 Q. So are there fees in</p>	<p>1 JANNA BULLOCK</p> <p>2 anything about this trust that was</p> <p>3 established.</p> <p>4 A. No.</p> <p>5 Q. Who established the trust --</p> <p>6 A. And I don't want to know.</p> <p>7 Q. Why not?</p> <p>8 A. I don't know.</p> <p>9 Q. So you're aware that</p> <p>10 Mr. Pisar, a lawyer, helped form this</p> <p>11 trust, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Are you aware of anything</p> <p>14 else about this trust?</p> <p>15 A. No.</p> <p>16 Q. Do you know any other assets</p> <p>17 that are held by the trust that holds</p> <p>18 the current apartment where you live?</p> <p>19 A. No.</p> <p>20 Q. How do you pay -- excuse me.</p> <p>21 Do you pay property tax on</p> <p>22 your apartment, the one where you</p> <p>23 currently live?</p> <p>24 A. I don't pay.</p> <p>25 Q. Who pays?</p>
Page 123	Page 125
<p>1 JANNA BULLOCK</p> <p>2 connection with that apartment?</p> <p>3 A. Yes.</p> <p>4 Q. And what are the monthly fees</p> <p>5 in connection with that apartment?</p> <p>6 A. I don't know.</p> <p>7 Q. Do you have any sense of the</p> <p>8 magnitude?</p> <p>9 A. Probably two, \$3,000.</p> <p>10 Q. Monthly?</p> <p>11 A. Yes.</p> <p>12 Q. How do those monthly -- do</p> <p>13 those fees get paid?</p> <p>14 A. Yes.</p> <p>15 Q. How do they get paid?</p> <p>16 A. They get paid by the trust.</p> <p>17 Q. Do you have any records</p> <p>18 reflecting the payment of these fees by</p> <p>19 the trust?</p> <p>20 A. No.</p> <p>21 Q. Who would have those records?</p> <p>22 A. The trustee.</p> <p>23 Q. Who is the trustee?</p> <p>24 A. I don't know.</p> <p>25 Q. Ms. Bullock, do you know</p>	<p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. Do you get a tax bill from</p> <p>4 the City of New York?</p> <p>5 A. I don't know.</p> <p>6 Q. Who would receive the tax</p> <p>7 bill if you don't?</p> <p>8 A. I don't know.</p> <p>9 Q. Do you receive any tax bills</p> <p>10 from any taxing authority?</p> <p>11 A. I don't know.</p> <p>12 Q. In the past year, have you</p> <p>13 received, at your primary residence,</p> <p>14 any tax bill?</p> <p>15 A. I don't know.</p> <p>16 Q. Are you working with a</p> <p>17 current tax attorney?</p> <p>18 A. I don't know.</p> <p>19 Q. Are you working with a</p> <p>20 current tax professional?</p> <p>21 A. I don't know.</p> <p>22 Q. Ms. Bullock, you're aware</p> <p>23 that you've made personal</p> <p>24 representations on your tax returns,</p> <p>25 correct?</p>

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33 (Pages 126 to 129)

Page 126	Page 128
<p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. You're representing to the,</p> <p>4 for instance, federal government, what</p> <p>5 you earn in income, what's deductible,</p> <p>6 credits that are owed to you.</p> <p>7 Do you understand that?</p> <p>8 A. I don't know.</p> <p>9 Q. Do you review those documents</p> <p>10 before they are submitted?</p> <p>11 A. I don't know.</p> <p>12 Q. Ms. Bullock, do you own any</p> <p>13 homes in the State of New York?</p> <p>14 A. No.</p> <p>15 Q. Do you own any other homes --</p> <p>16 excuse me.</p> <p>17 Do you own any homes in the</p> <p>18 US?</p> <p>19 A. No.</p> <p>20 Q. It's your testimony that you</p> <p>21 own no property in the United States?</p> <p>22 A. No.</p> <p>23 Q. It's not your testimony?</p> <p>24 A. Yes.</p> <p>25 Q. So just for the sake of</p>	<p>1 JANNA BULLOCK</p> <p>2 taken at this time.)</p> <p>3 THE VIDEOGRAPHER: The time</p> <p>4 is approximately 2:22 p.m., and we</p> <p>5 are back on the record.</p> <p>6 Q. Ms. Bullock, do you own</p> <p>7 property in Southampton?</p> <p>8 A. No.</p> <p>9 Q. Have you owned property in</p> <p>10 Southampton at any time since</p> <p>11 August 2012?</p> <p>12 A. No.</p> <p>13 MS. DONOVAN: I think we're</p> <p>14 on Exhibit 6.</p> <p>15 Can we please mark the</p> <p>16 document I'm handing you now as</p> <p>17 Exhibit 6.</p> <p>18 (Whereupon, an open listing</p> <p>19 agreement was marked as Bullock</p> <p>20 Exhibit 6 for Identification.)</p> <p>21 Q. Ms. Bullock, could you please</p> <p>22 look at Exhibit 6.</p> <p>23 A. Mm hm.</p> <p>24 Q. Are you familiar with the</p> <p>25 document that is Exhibit 6?</p>
Page 127	Page 129
<p>1 JANNA BULLOCK</p> <p>2 clarity, your testimony is that you own</p> <p>3 no property in the United States?</p> <p>4 A. I do not own any property in</p> <p>5 the United States.</p> <p>6 Q. At any point since</p> <p>7 August 2012, have you owned property in</p> <p>8 the United States?</p> <p>9 A. No.</p> <p>10 Q. Do you rent any property</p> <p>11 currently?</p> <p>12 A. No.</p> <p>13 Q. At any point since</p> <p>14 August 2012, have you rented property?</p> <p>15 A. No.</p> <p>16 THE WITNESS: Can I step out</p> <p>17 for one second?</p> <p>18 MS. DONOVAN: We'll go off</p> <p>19 for one moment, but we need to</p> <p>20 keep these briefs so that we can</p> <p>21 finish today.</p> <p>22 THE VIDEOGRAPHER: The time</p> <p>23 is approximately 2:14 p.m., and</p> <p>24 we're going off the record.</p> <p>25 (Whereupon, a short break was</p>	<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 MS. DONOVAN: For the record,</p> <p>4 it's an open listing agreement</p> <p>5 dated November 18, 2014, to Janna</p> <p>6 Bullock with respect to 210 Meadow</p> <p>7 Lane, Southampton, New York.</p> <p>8 First paragraph reading,</p> <p>9 "This will confirm that you have</p> <p>10 engaged Brown Harris Stevens of</p> <p>11 the Hamptons LLC, under an open</p> <p>12 listing agreement commencing on</p> <p>13 November 18, 2014. We are</p> <p>14 authorized to list the property at</p> <p>15 a sales price of \$29 million."</p> <p>16 End quote.</p> <p>17 Q. Do you recall entering into</p> <p>18 an opening listing agreement with Brown</p> <p>19 Harris Stevens in connection with the</p> <p>20 property at 210 Meadow Lane?</p> <p>21 A. No.</p> <p>22 Q. At any point prior to</p> <p>23 November 2014, did you engage Brown</p> <p>24 Harris Stevens of the Hamptons to list</p> <p>25 a property at 210 Meadow Lane?</p>

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34 (Pages 130 to 133)

Page 130

1 JANNA BULLOCK
 2 A. No.
 3 Q. At any point subsequent, did
 4 you engage Brown Harris Stevens of the
 5 Hamptons to list a property at 210
 6 Meadow Lane?
 7 A. No.
 8 MS. DONOVAN: Can we please
 9 mark as Exhibit 7, a document, an
 10 e-mail correspondence that I'm
 11 handing you now.
 12 (Whereupon, an e-mail
 13 correspondence was marked as
 14 Bullock Exhibit 7 for
 15 Identification.)
 16 Q. Ms. Bullock, please review
 17 Exhibit 7. It's an e-mail
 18 correspondence, so it's typically
 19 easier to review it from back to front.
 20 Ms. Bullock are you familiar
 21 with Exhibit 7?
 22 A. No.
 23 Q. Now, Ms. Bullock, if you
 24 could go to Page 2 of 3, please.
 25 A. Mm hm.

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1 JANNA BULLOCK
 2 available for 210 Meadow Lane? Jill
 3 Yablon would like to offer 170K.
 4 Please let me know your thoughts." End
 5 quote.
 6 Do you know Tony Cerio?
 7 A. I don't remember.
 8 Q. Did you work with any real
 9 estate brokers in the Hamptons at any
 10 point since August 2012?
 11 A. I don't know. Maybe.
 12 Q. Why might you then have
 13 worked with real estate brokers in the
 14 Hamptons?
 15 MR. CUCCARO: Objection to
 16 form.
 17 A. Because I managed 210.
 18 Q. You just earlier said that
 19 you weren't even sure whether the
 20 address is real.
 21 A. Yes, this address is not real
 22 (indicating).
 23 Q. The Union Street [phonetic].
 24 You're aware of the property
 25 at 210 Meadow Lane, correct?

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1 JANNA BULLOCK
 2 Q. It's an e-mail from Janna
 3 Bullock at an e-mail address,
 4 [REDACTED] to a Tony Cerio
 5 with regard to 210 Meadow Lane.
 6 Is that your e-mail address,
 7 Ms. Bullock?
 8 A. I don't use this e-mail
 9 address.
 10 Q. Have you ever used this
 11 e-mail address?
 12 A. Only Janna goes through
 13 there.
 14 Q. So did you not e-mail Tony
 15 Cerio from this e-mail address?
 16 A. I don't remember everything.
 17 I also have to point out the address
 18 that is listed here, I don't know if
 19 this address even exists.
 20 Q. Okay. Let's keep looking at
 21 e-mail that's Exhibit 7 in front of
 22 you.
 23 So at the bottom, Tony
 24 e-mails you and he says, "Hi, Janna.
 25 Hope all is well. Is August still

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1 JANNA BULLOCK
 2 A. Yes, I do.
 3 Q. When you say you manage the
 4 property, what do you mean by that?
 5 A. It means that I made sure
 6 that there is water, there is
 7 electricity, there is cable, there is
 8 pool in operating order.
 9 Q. For how long have you managed
 10 210 Meadow Lane?
 11 A. For a really long time.
 12 Q. Who owns the property at 210
 13 Meadow Lane?
 14 A. The trust owns.
 15 Q. The same trust that owns your
 16 apartment?
 17 A. I don't know.
 18 Q. Ms. Bullock, are you the
 19 beneficial owner of the property at 210
 20 Meadow Lane?
 21 A. No, I am not.
 22 Q. Do you have any rights with
 23 respect to that property?
 24 A. I only take care of this
 25 property.

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35 (Pages 134 to 137)

<p style="text-align: right;">Page 134</p> <p>1 JANNA BULLOCK</p> <p>2 Q. So by that description,</p> <p>3 you're like a groundskeeper for the</p> <p>4 house?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. A groundskeeper who is</p> <p>7 authorized to rent it?</p> <p>8 A. I didn't rent it. There's no</p> <p>9 signature on this.</p> <p>10 Q. Okay. Let's keep going in</p> <p>11 your e-mail chain.</p> <p>12 So you respond, "It's too</p> <p>13 early in a season to consider such a</p> <p>14 low price, but she was an excellent</p> <p>15 tenant."</p> <p>16 So by she was an excellent</p> <p>17 tenant, you're referring to Jill</p> <p>18 Yablon; is that correct?</p> <p>19 A. It might not be me who</p> <p>20 answered this e-mail.</p> <p>21 MR. CUCCARO: I note for the</p> <p>22 record that Exhibit 7 is not a</p> <p>23 document that we produced in this</p> <p>24 litigation, nor is Exhibit 6.</p> <p>25 MS. DONOVAN: Part of the</p>	<p style="text-align: right;">Page 136</p> <p>1 JANNA BULLOCK</p> <p>2 e-mail.</p> <p>3 Q. You don't recall having any</p> <p>4 discussion with Tony Cerio about</p> <p>5 renting the property at 210 Meadow Lane</p> <p>6 in the summer of 2015?</p> <p>7 A. I don't remember.</p> <p>8 Q. Did you ever rent the</p> <p>9 property at 210 Meadow Lane to Jill</p> <p>10 Yablon?</p> <p>11 A. I don't remember.</p> <p>12 Q. Okay. You said or the writer</p> <p>13 writing as Janna Bullock said, "She was</p> <p>14 an excellent tenant."</p> <p>15 Do you know Jill Yablon.</p> <p>16 A. No, I don't.</p> <p>17 Q. Tony Cerio replies, "I</p> <p>18 understand. What would the bottom line</p> <p>19 be?"</p> <p>20 Janna Bullock replies, "750</p> <p>21 for the season."</p> <p>22 Is that the typical price at</p> <p>23 which you rented the home at 210 Meadow</p> <p>24 Lane?</p> <p>25 MR. CUCCARO: Objection to</p>
<p style="text-align: right;">Page 135</p> <p>1 JANNA BULLOCK</p> <p>2 problem we're going to run into is</p> <p>3 that this document was not</p> <p>4 produced by Ms. Bullock in</p> <p>5 response to a document subpoena</p> <p>6 that would have called for it.</p> <p>7 Q. So Ms. Bullock --</p> <p>8 A. It's not my document. I</p> <p>9 don't know where it's coming from.</p> <p>10 Q. I want you to focus on the</p> <p>11 Exhibit 7, the e-mail correspondence</p> <p>12 that's before you, where Janna Bullock</p> <p>13 is replying to Tony Cerio saying, "It's</p> <p>14 too early in a season to consider such</p> <p>15 a low price, but she was an excellent</p> <p>16 tenant."</p> <p>17 Ms. Bullock, did you write</p> <p>18 that?</p> <p>19 A. I don't remember.</p> <p>20 Q. You're under oath.</p> <p>21 Do you have any reason to</p> <p>22 believe somebody else accessed your</p> <p>23 e-mail and wrote to Tony Cerio from it?</p> <p>24 A. My e-mails were compromised</p> <p>25 many times. I don't recall this</p>	<p style="text-align: right;">Page 137</p> <p>1 JANNA BULLOCK</p> <p>2 form.</p> <p>3 A. No. I don't know.</p> <p>4 Q. Ms. Bullock, was the home at</p> <p>5 210 Meadow Lane rented for the 2015</p> <p>6 summer season?</p> <p>7 A. I don't remember.</p> <p>8 Q. How many other properties do</p> <p>9 you manage?</p> <p>10 A. At least one more.</p> <p>11 Q. What's that?</p> <p>12 A. 2170 Meadow Lane.</p> <p>13 Q. Did you own that property?</p> <p>14 A. No.</p> <p>15 Q. Who owns that property?</p> <p>16 A. The property is in a trust.</p> <p>17 Q. What trust?</p> <p>18 A. I don't remember the name.</p> <p>19 Q. You'll recall that the</p> <p>20 subpoena that was served on you for</p> <p>21 documents in this case, the one through</p> <p>22 the District Court for the Southern</p> <p>23 District of New York called for you to</p> <p>24 disclose all assets held directly by</p> <p>25 you or indirectly through other natural</p>

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36 (Pages 138 to 141)

Page 138

1 JANNA BULLOCK
 2 or legal entities.
 3 A. But I do not own it.
 4 Q. Who owns the home at 2170 and
 5 210 Meadow Lane?
 6 A. The trust.
 7 Q. And tell me everything you
 8 can recall with about that trust.
 9 A. The trust was set up by
 10 Samuel Pisar really long time ago for
 11 the benefit of my children.
 12 Q. So this property is held in
 13 trust for the benefit of your children?
 14 A. Yes.
 15 Q. When was it setup?
 16 A. 1996.
 17 Q. What can you do with respect
 18 to this property?
 19 MR. CUCCARO: Objection to
 20 form.
 21 You can answer.
 22 A. I cannot do anything.
 23 Q. But you can rent it?
 24 A. I cannot do anything.
 25 Q. If you rent it, where does

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1 JANNA BULLOCK
 2 Q. So how do you know you have
 3 no rights?
 4 A. Because I don't have any
 5 rights.
 6 Q. Do you host events,
 7 Ms. Bullock, at the property at 210
 8 Meadow Lane?
 9 A. No.
 10 Q. Have you ever?
 11 A. In probably 2005, 2004.
 12 Q. Did you host multiple events?
 13 A. No.
 14 Q. So what was the one event you
 15 hosted at 210 Meadow Lane?
 16 A. It was a house opening.
 17 Q. And who attended the house
 18 opening in 2000 -- what year?
 19 A. I don't remember.
 20 Q. You don't remember who
 21 attended or the year?
 22 A. I don't remember who attended
 23 or year.
 24 Q. Ms. Bullock, you're in the
 25 real estate business -- or you were.

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1 JANNA BULLOCK
 2 the income from the rental go?
 3 A. I cannot do anything.
 4 Q. Ms. Bullock, have you ever
 5 attempted to rent the property at 210
 6 Meadow Lane?
 7 A. The property was rented.
 8 Q. When was the property rented?
 9 A. I don't remember.
 10 Q. Roughly?
 11 A. I don't remember.
 12 Q. In the last five years?
 13 A. I don't remember.
 14 Q. Do you recall who rented the
 15 property?
 16 A. No.
 17 Q. As the manager of 210 Meadow
 18 Lane, can you engage in discussion with
 19 brokers to sell that property?
 20 A. I don't know.
 21 Q. What's the source of your
 22 understanding of your rights with
 23 respect to the property at 210 Meadow
 24 Lane?
 25 A. I have no rights.

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1 JANNA BULLOCK
 2 Do you understand what an
 3 open listing agreement is?
 4 A. I do.
 5 Q. What is it?
 6 A. It's when broker lists the
 7 house on his own will. When the broker
 8 has no agreement with the purchaser --
 9 when the broker has no agreement with
 10 the owner to list the house.
 11 Q. So the broker listing the
 12 house doesn't have the exclusive
 13 listing, correct?
 14 A. Well, doesn't have any
 15 listing. It's not a listing.
 16 Q. So how long did you work in
 17 the real estate business?
 18 A. Enough to understand what
 19 open listing is.
 20 Q. So the broker who has an open
 21 listing cannot sell the house?
 22 A. Anybody could sell the house.
 23 Q. Right. Including that broker
 24 who has that open listing agreement?
 25 A. Any broker could sell the

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37 (Pages 142 to 145)

<p style="text-align: right;">Page 142</p> <p>1 JANNA BULLOCK</p> <p>2 house. As long as he or she has a</p> <p>3 license, he could sell the house.</p> <p>4 Q. And in order to enter into an</p> <p>5 open listing agreement, the broker</p> <p>6 comes to an agreement with the seller</p> <p>7 that they are going to be in an open</p> <p>8 listing agreement?</p> <p>9 A. No, my understanding is that</p> <p>10 for the open listing, you don't need an</p> <p>11 open agreement. If you walk the street</p> <p>12 and you see a sign for sale, you go and</p> <p>13 you could show it to your clients.</p> <p>14 Q. If it's for sale by seller?</p> <p>15 A. Or by broker.</p> <p>16 Q. And if it's an exclusive</p> <p>17 listing by a broker, another person can</p> <p>18 list it as an open listing?</p> <p>19 A. I don't think that open</p> <p>20 listing in general has any value</p> <p>21 whatsoever.</p> <p>22 Q. Excuse me?</p> <p>23 A. I don't think that open</p> <p>24 listing has any value whatsoever. It</p> <p>25 mostly -- just the broker just like to</p>	<p style="text-align: right;">Page 144</p> <p>1 JANNA BULLOCK</p> <p>2 Q. And it says, "This will</p> <p>3 confirm you have engaged Brown Harris</p> <p>4 Stevens of the Hamptons LLC under an</p> <p>5 open listing agreement commencing on</p> <p>6 November 18, 2014. We are authorized</p> <p>7 to list the property at a sales price</p> <p>8 of \$22 million." End quote.</p> <p>9 MR. CUCCARO: I note for the</p> <p>10 record that this is a document</p> <p>11 that has not been executed.</p> <p>12 A. And it has no address here.</p> <p>13 Q. Now, Ms. Bullock, I'm going</p> <p>14 to provide the court reporter with</p> <p>15 another document in connection with the</p> <p>16 listing at 2170.</p> <p>17 MS. DONOVAN: Will you please</p> <p>18 mark this as Exhibit 9.</p> <p>19 It's an e-mail</p> <p>20 correspondence.</p> <p>21 (Whereupon, an e-mail</p> <p>22 correspondence was marked as</p> <p>23 Bullock Exhibit 9 for</p> <p>24 Identification.)</p> <p>25 Q. Ms. Bullock, if you could,</p>
<p style="text-align: right;">Page 143</p> <p>1 JANNA BULLOCK</p> <p>2 accumulate traffic, so they list things</p> <p>3 that they -- whatever they feel like</p> <p>4 listing.</p> <p>5 Q. And sellers sometimes want to</p> <p>6 get traffic through their properties by</p> <p>7 multiple different brokers, so they go</p> <p>8 into open listing agreements?</p> <p>9 A. I do not know about that.</p> <p>10 Q. Have you ever sold a home in</p> <p>11 a open listing?</p> <p>12 A. I don't know. I don't</p> <p>13 remember.</p> <p>14 MS. DONOVAN: Can we please</p> <p>15 mark this as Exhibit 8.</p> <p>16 It's another open listing</p> <p>17 agreement, this time for 2170</p> <p>18 Meadow Lane.</p> <p>19 (Whereupon, an open listing</p> <p>20 agreement was marked as Bullock</p> <p>21 Exhibit 8 for Identification.)</p> <p>22 Q. Could you please review</p> <p>23 Exhibit 8, Ms. Bullock?</p> <p>24 A. Yes. It's the same thing.</p> <p>25 It's the same address.</p>	<p style="text-align: right;">Page 145</p> <p>1 JANNA BULLOCK</p> <p>2 please review Exhibit 9.</p> <p>3 A. Okay.</p> <p>4 Q. Do you recognize Exhibit 9?</p> <p>5 A. No.</p> <p>6 Q. So we'll start at Page 2 in</p> <p>7 an e-mail from Tony Cerio from</p> <p>8 November 18, 2014.</p> <p>9 He writes, "Hi, Janna. I am</p> <p>10 updating all of our Southampton</p> <p>11 oceanfront listings for sale and rent.</p> <p>12 Would you be so kind as to give us your</p> <p>13 2015 rates and the sale status of the</p> <p>14 property? I currently have a customer</p> <p>15 who would be interested in the property</p> <p>16 for sale. Could you please advise."</p> <p>17 Do you recall receiving this</p> <p>18 communication from Tony Cerio?</p> <p>19 A. No.</p> <p>20 Q. Do you have reason to believe</p> <p>21 you did not receive this communication</p> <p>22 from Tony Cerio?</p> <p>23 A. I don't remember.</p> <p>24 Q. Okay. On Tuesday</p> <p>25 November 18, same day,</p>

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38 (Pages 146 to 149)

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1 JANNA BULLOCK
 2 [REDACTED] replies, "Hi,
 3 Tony. Both properties have a free
 4 listing and could be easily find in a
 5 website. 210 is 29 MLN, 750K rent for
 6 the season. 2170 is 22. Rent is 350
 7 for the season."
 8 Ms. Bullock, what did you
 9 mean by 210 is 29 MLN?
 10 A. I don't know.
 11 Q. Is that a reference to
 12 29 million?
 13 A. I don't know.
 14 Q. Is 29 million the sales price
 15 that you were quoting in November of
 16 2014 for the property at 210 Meadow
 17 Lane?
 18 A. I don't know.
 19 Q. Ms. Bullock, you say that
 20 2170 is 22.
 21 What did you mean by that?
 22 A. I don't know.
 23 Q. Ms. Bullock, do you recall
 24 writing this e-mail?
 25 A. I don't remember.

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1 JANNA BULLOCK
 2 Asked and answered.
 3 Q. At some point there needs to
 4 be an answer of something different
 5 than I don't know.
 6 A. I don't know.
 7 Q. Ms. Bullock, do you recall
 8 ever seeking to rent the property at
 9 2170 Meadow Lane?
 10 A. I don't know.
 11 Q. What don't you know?
 12 A. I don't know anything. I'm
 13 just exhausted.
 14 Q. So you testified earlier that
 15 there was nothing impairing your
 16 ability to give truthful and accurate
 17 testimony.
 18 Is that still the case,
 19 Ms. Bullock?
 20 A. Yes.
 21 Q. And the testimony you've been
 22 providing is truthful and accurate?
 23 A. Yes, it's just a lot of
 24 pressure.
 25 Q. So all I want you to do --

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1 JANNA BULLOCK
 2 Q. Do you recall generally
 3 thinking about renting or selling
 4 either of the Southampton properties
 5 around November 2014?
 6 A. I don't remember.
 7 Q. So is the sale of a
 8 \$29 million house, is that a
 9 significant transaction for you?
 10 MR. CUCCARO: Objection to
 11 form.
 12 A. I don't know.
 13 Q. How frequently do you sell
 14 \$29 million properties?
 15 A. I don't know.
 16 Q. More than 100 times in your
 17 life?
 18 A. I don't know. I don't
 19 remember.
 20 Q. Is it possible then -- so I
 21 guess go back to my question.
 22 In more than a hundred
 23 instances, have you sold a property
 24 worth more than \$29 million?
 25 MR. CUCCARO: Objection.

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1 JANNA BULLOCK
 2 and this part, I really don't mean to
 3 be a pressure-filled activity -- is to
 4 think back and remember, did you try to
 5 sell a house for \$29 million?
 6 A. I don't know. People are in
 7 the business of selling and buying.
 8 That's all it is.
 9 Q. But you're in that business,
 10 correct?
 11 A. No, I'm not a broker.
 12 Q. In 2014, were you acting as a
 13 seller?
 14 A. No, I was acting as an agent.
 15 Q. An agent for who?
 16 A. For 2170 and 210.
 17 Q. And what's the basis for that
 18 agency relationship?
 19 A. I take care of property.
 20 Q. Did you enter into any
 21 agreements that allowed you to offer
 22 for sale the property at 2170 Meadow
 23 Lane?
 24 A. I don't remember.
 25 Q. You've testified that you

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39 (Pages 150 to 153)

Page 150	Page 152
<p>1 JANNA BULLOCK</p> <p>2 were the manager for the property?</p> <p>3 A. That's correct.</p> <p>4 Q. You've testified that you</p> <p>5 were an agent for the property?</p> <p>6 A. That's correct.</p> <p>7 Q. Which allows you to offer for</p> <p>8 sale the property?</p> <p>9 A. Whatever is with the</p> <p>10 agreement.</p> <p>11 Q. What's that agreement?</p> <p>12 A. That I'm taking care of the</p> <p>13 property.</p> <p>14 Q. When did you make this</p> <p>15 agreement?</p> <p>16 A. At the time of the purchase.</p> <p>17 Q. When was the time of the</p> <p>18 purchase?</p> <p>19 A. It was a long time ago. I</p> <p>20 don't remember exactly.</p> <p>21 Q. Who did you make the</p> <p>22 agreement with?</p> <p>23 A. It was a trustee.</p> <p>24 Q. Who is the trustee?</p> <p>25 A. It was the seller who is the</p>	<p>1 JANNA BULLOCK</p> <p>2 correspondence.</p> <p>3 (Whereupon, an e-mail</p> <p>4 correspondence was marked as</p> <p>5 Bullock Exhibit 10 for</p> <p>6 Identification.)</p> <p>7 Q. Ms. Bullock, please look at</p> <p>8 Exhibit 10.</p> <p>9 Do you recognize Exhibit 10?</p> <p>10 A. No.</p> <p>11 Q. Okay. Ms. Bullock, please go</p> <p>12 to Page 2. We get another e-mail from</p> <p>13 Tony Cerio to you Janna.</p> <p>14 "Hi, Janna. My assistant,</p> <p>15 Jared, e-mailed you yesterday in regard</p> <p>16 to have our photographer shoot new</p> <p>17 pictures of both properties. We are</p> <p>18 part of Chrisitie's Great Estates, and</p> <p>19 we need all high resolution photos so</p> <p>20 we can send our customers the best</p> <p>21 possible pictures. Please advise."</p> <p>22 End quote.</p> <p>23 Do you recall having high</p> <p>24 resolution photos taken of the</p> <p>25 properties at 210 and 2170 Meadow Lane?</p>
Page 151	Page 153
<p>1 JANNA BULLOCK</p> <p>2 lawyer.</p> <p>3 Q. And who was that?</p> <p>4 A. It was Samuel Pizar.</p> <p>5 Q. Do you know Samuel Pizar</p> <p>6 socially?</p> <p>7 A. I've met him through my</p> <p>8 business partner.</p> <p>9 Q. And who is your business</p> <p>10 partner?</p> <p>11 A. I mentioned his name before.</p> <p>12 Jeffrey Steiner.</p> <p>13 Q. Okay. So in what other</p> <p>14 businesses is Mr. Steiner a business</p> <p>15 partner?</p> <p>16 A. Just real estate.</p> <p>17 Q. What real estate in</p> <p>18 particular?</p> <p>19 A. We've done investments in</p> <p>20 Russia successfully together.</p> <p>21 Q. Ms. Bullock, I'm going to</p> <p>22 give you another e-mail.</p> <p>23 MS. DONOVAN: Would you</p> <p>24 please mark this as Exhibit 10.</p> <p>25 It's another e-mail</p>	<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. Do you remember any events</p> <p>4 from three years ago?</p> <p>5 MR. CUCCARO: Objection to</p> <p>6 form.</p> <p>7 A. I don't know.</p> <p>8 Q. Now, Ms. Bullock you reply,</p> <p>9 "As long as we understand it's an open</p> <p>10 listing, I'll arrange you the access."</p> <p>11 Do you recall this exchange</p> <p>12 with Mr. Cerio?</p> <p>13 A. No.</p> <p>14 Q. He replies, "Of course it is</p> <p>15 an open listing for sale and rent. Let</p> <p>16 me know what day is best, and I will</p> <p>17 arrange with our photographer."</p> <p>18 You reply, "Any day."</p> <p>19 Do you recall corresponding</p> <p>20 with Mr. Cerio about the date on which</p> <p>21 a photographer could take pictures of</p> <p>22 your homes?</p> <p>23 A. No.</p> <p>24 Q. Have you previously had</p> <p>25 photographs take pictures of these</p>

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40 (Pages 154 to 157)

Page 154

1 JANNA BULLOCK
 2 homes?
 3 A. I don't remember.
 4 Q. Are you familiar with Brown
 5 Harris Stevens of the Hamptons?
 6 A. I remember -- I know the
 7 name.
 8 Q. What do you know about them?
 9 A. Nothing in particular.
 10 Q. They're a reputable firm?
 11 A. They're okay.
 12 Q. Why do you say "they're
 13 okay"?
 14 A. Because there are a lot of
 15 reputable firms.
 16 Q. Okay. But you have no reason
 17 to find them dishonest?
 18 A. Oh, I would not make any
 19 statements.
 20 MS. DONOVAN: This is Exhibit
 21 11, please. If we could mark
 22 this. Another correspondence
 23 between Janna Bullock and Tony
 24 Cerio.
 25 (Whereupon, an e-mail

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1 JANNA BULLOCK
 2 Parens, "(Bosch on a wall next to the
 3 laundry room)," End paren, "So the gate
 4 starts functioning again. Many thanks,
 5 JB." End quote.
 6 Do you recall responding like
 7 this to Mr. Cerio?
 8 A. No.
 9 Q. Is that the command for the
 10 gate at 2170 Meadow Lane?
 11 A. I don't know.
 12 Q. Were you responsible for the
 13 commands on the gate as the property
 14 manager or agent of 2170?
 15 MR. CUCCARO: Objection to
 16 form.
 17 A. I don't know.
 18 Q. Ms. Bullock, did you search
 19 your [REDACTED] e-mail
 20 address as part of your production of
 21 documents in response to the subpoena?
 22 A. The computer was turn in, so.
 23 Q. So you understand that if you
 24 give a computer, certain material is
 25 stored on the computer, certain

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1 JANNA BULLOCK
 2 correspondence was marked as
 3 Bullock Exhibit 11 for
 4 Identification.)
 5 Q. Ms. Bullock, do you recognize
 6 Exhibit 11?
 7 A. No.
 8 Q. And this time, on
 9 November 20, 2014, Tony Cerio writes
 10 you, quote, "Hi, Janna. Are we all at
 11 set to shoot pictures tomorrow at 9:00
 12 a.m.? We would like to shoot 2170
 13 Meadow Lane first, followed by 210
 14 Meadow Lane. Please advise." End
 15 quote.
 16 Do you recall this
 17 communication from Tony Cerio?
 18 A. No.
 19 Q. You reply same day, "Hi,
 20 Tony. It was nice talking to you this
 21 morning. If your assistant comes
 22 tomorrow, and the gate would be
 23 opened," parens, "(fire alarm went
 24 on)," end parens. "Please ask her to
 25 push [REDACTED] on a security pad."

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1 JANNA BULLOCK
 2 material is stored for the servers?
 3 Do you understand that?
 4 A. I don't know.
 5 Q. Did you tell your lawyers
 6 that you maintained an e-mail account
 7 that was [REDACTED]
 8 A. I don't remember. I think I
 9 told everything.
 10 Q. Ms. Bullock, if I asked you
 11 to search for this e-mail on your
 12 [REDACTED] e-mail address,
 13 would you have it?
 14 A. I don't know. I don't use
 15 this e-mail account at all.
 16 Q. Well, you used it in November
 17 of 2014, correct?
 18 A. I don't know.
 19 Q. What do you mean you don't
 20 know? We've looked at four or five
 21 different e-mails that have been
 22 communications between you and a real
 23 estate broker on an e-mail address that
 24 you've never disclosed until now when
 25 you're confronted with an e-mail.

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41 (Pages 158 to 161)

<p style="text-align: right;">Page 158</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't know. This e-mail</p> <p>3 was never used for any purposes.</p> <p>4 Q. So if we looked at this</p> <p>5 e-mail, if your attorneys looked for</p> <p>6 different communications, they would</p> <p>7 find no other correspondence with</p> <p>8 brokers?</p> <p>9 A. I don't know.</p> <p>10 Q. No other offers to sell any</p> <p>11 other property?</p> <p>12 A. I don't know.</p> <p>13 Q. No other offers to rent any</p> <p>14 other property?</p> <p>15 A. I have no answers to those</p> <p>16 question.</p> <p>17 Q. Well, did you use that</p> <p>18 e-mail?</p> <p>19 A. I do not know. I used</p> <p>20 [REDACTED]</p> <p>21 Q. And obviously, sometimes you</p> <p>22 used [REDACTED]</p> <p>23 A. I don't know how. I just</p> <p>24 don't use this e-mail.</p> <p>25 Q. Currently?</p>	<p style="text-align: right;">Page 160</p> <p>1 JANNA BULLOCK</p> <p>2 property manager?</p> <p>3 A. I take care of the property.</p> <p>4 Q. Tell me everything you do.</p> <p>5 A. I take care of the property.</p> <p>6 Q. What does that mean?</p> <p>7 A. I look after it.</p> <p>8 Q. And you hire people to do</p> <p>9 certain work with respect to that</p> <p>10 property?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. What work?</p> <p>13 A. Plumbing, pool work, electric</p> <p>14 work, gardening.</p> <p>15 Q. When somebody -- one of those</p> <p>16 people gives you a bill, here's a bill</p> <p>17 for \$1,000 for pool cleaning, what do</p> <p>18 you do with the bill?</p> <p>19 A. The bill gets paid.</p> <p>20 Q. How?</p> <p>21 A. It just gets paid.</p> <p>22 Q. It doesn't just get paid. I</p> <p>23 want to hear how that bill gets paid.</p> <p>24 What do you do so that that</p> <p>25 bill gets paid?</p>
<p style="text-align: right;">Page 159</p> <p>1 JANNA BULLOCK</p> <p>2 A. Not currently. I went from</p> <p>3 one professional e-mail to another. I</p> <p>4 didn't use this e-mail.</p> <p>5 Q. Is this a social e-mail or a</p> <p>6 nonprofessional e-mail?</p> <p>7 A. I don't know what kind of</p> <p>8 e-mail is that. I don't use it.</p> <p>9 Q. When is the last time you've</p> <p>10 used this e-mail?</p> <p>11 A. I don't know. From my</p> <p>12 recollection, I don't use this e-mail.</p> <p>13 Q. Don't, current?</p> <p>14 A. I do not.</p> <p>15 Q. When is the last time you saw</p> <p>16 Tony Cerio?</p> <p>17 A. I don't remember.</p> <p>18 Q. What's the current status of</p> <p>19 the property at 210 Meadow Lane?</p> <p>20 A. I don't know.</p> <p>21 Q. Are you still a property</p> <p>22 manager of the property at 210 Meadow</p> <p>23 Lane?</p> <p>24 A. I am.</p> <p>25 Q. And what do you do as the</p>	<p style="text-align: right;">Page 161</p> <p>1 JANNA BULLOCK</p> <p>2 A. The bill gets paid.</p> <p>3 Q. How?</p> <p>4 A. I don't know.</p> <p>5 Q. Do you receive any bills in</p> <p>6 connection with the house at 210 Meadow</p> <p>7 Lane for some of the services you just</p> <p>8 described?</p> <p>9 A. I don't know.</p> <p>10 Q. What do you mean, you don't</p> <p>11 know?</p> <p>12 A. It might go directly to the</p> <p>13 property.</p> <p>14 Q. Have you received any bill</p> <p>15 from any person who does work on the</p> <p>16 house at 210 Meadow Lane? It's a</p> <p>17 yes-or-no answer.</p> <p>18 A. Yes.</p> <p>19 Q. What bills have you received</p> <p>20 for the house at 210 Meadow Lane?</p> <p>21 A. Plumbing. Electric. I would</p> <p>22 guess.</p> <p>23 Q. Don't guess. Did you receive</p> <p>24 a plumbing bill for the house at 210</p> <p>25 Meadow Lane?</p>

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<p>1 JANNA BULLOCK</p> <p>2 A. Yes.</p> <p>3 Q. When you received that</p> <p>4 plumbing bill, any -- a plumbing bill</p> <p>5 for the house at 210 Meadow Lane, what</p> <p>6 do you do with that bill?</p> <p>7 A. I don't know.</p> <p>8 Q. Do you give it to somebody?</p> <p>9 A. I don't know.</p> <p>10 Q. I need to understand how you</p> <p>11 couldn't know you what do with bills</p> <p>12 you received.</p> <p>13 A. I probably don't know what I</p> <p>14 do.</p> <p>15 THE WITNESS: I will take a</p> <p>16 break.</p> <p>17 I don't know what I would do.</p> <p>18 MS. DONOVAN: Off the record</p> <p>19 for a moment.</p> <p>20 THE VIDEOGRAPHER: The time</p> <p>21 is approximately 2:59 p.m., and</p> <p>22 we're going off the record.</p> <p>23 (Whereupon, a break was taken</p> <p>24 at this time.)</p> <p>25 THE VIDEOGRAPHER: The time</p>	<p>1 JANNA BULLOCK</p> <p>2 Suburban?</p> <p>3 A. I don't remember.</p> <p>4 Q. When did you obtain the</p> <p>5 Suburban?</p> <p>6 A. It was a long time ago.</p> <p>7 Q. What's a long time ago?</p> <p>8 A. I don't know. It's pretty</p> <p>9 old.</p> <p>10 Q. Roughly?</p> <p>11 A. I -- I trade in the car I had</p> <p>12 before for Suburban.</p> <p>13 Q. So other than a Suburban,</p> <p>14 Aston Martin, you have no other cars.</p> <p>15 A. I don't. I don't.</p> <p>16 Q. Where do you keep the Aston</p> <p>17 Martin?</p> <p>18 A. At home. I keep it in</p> <p>19 garage.</p> <p>20 Q. In the City?</p> <p>21 A. No.</p> <p>22 Q. Where?</p> <p>23 A. In the country.</p> <p>24 Q. Where?</p> <p>25 A. At 2170 Meadow Lane.</p>
Page 163	Page 165
<p>1 JANNA BULLOCK</p> <p>2 is approximately 3:15 p.m.</p> <p>3 This is the start of Media</p> <p>4 Unit Number 4, and we are back on</p> <p>5 the record.</p> <p>6 Q. Ms. Bullock, do you own any</p> <p>7 vehicles?</p> <p>8 A. I do.</p> <p>9 Q. And what are those vehicles?</p> <p>10 A. I own old Aston Martin.</p> <p>11 Q. An old Aston Martin?</p> <p>12 A. (Nonverbal gesture).</p> <p>13 Q. Did you purchase the Aston</p> <p>14 Martin?</p> <p>15 A. No. My ex-husband gave it to</p> <p>16 me as a present.</p> <p>17 Q. Roughly when was this?</p> <p>18 A. When my daughter was born.</p> <p>19 Q. So that was?</p> <p>20 A. 1996.</p> <p>21 Q. Any other cars?</p> <p>22 A. None that I own.</p> <p>23 Q. Do you use any other cars?</p> <p>24 A. I use a Suburban sometimes.</p> <p>25 Q. How did you obtain the</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. How large is the garage</p> <p>3 there?</p> <p>4 A. It has two cars.</p> <p>5 Q. So the Aston Martin is in</p> <p>6 there, and is any other car kept in the</p> <p>7 garage?</p> <p>8 A. My daughter's car is in</p> <p>9 there.</p> <p>10 Q. How old is your daughter?</p> <p>11 A. Twenty-one.</p> <p>12 Q. Did you buy her her car?</p> <p>13 A. I didn't buy it.</p> <p>14 Q. Who did?</p> <p>15 A. The trust bought it.</p> <p>16 Q. What trust?</p> <p>17 A. I don't remember.</p> <p>18 Q. Is it the Azur Trust?</p> <p>19 A. I don't remember.</p> <p>20 Q. Is it the Purple Trust?</p> <p>21 A. I don't remember.</p> <p>22 Q. Is it the Golden Venture</p> <p>23 Trust?</p> <p>24 A. I don't remember.</p> <p>25 Q. Are there any other trust</p>

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43 (Pages 166 to 169)

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<p>1 JANNA BULLOCK</p> <p>2 that you're aware of?</p> <p>3 A. I don't remember.</p> <p>4 Q. So there could be more than</p> <p>5 those three trust?</p> <p>6 A. I don't know.</p> <p>7 Q. The apartment in New York,</p> <p>8 your primary residence, is that held by</p> <p>9 one of the three trust I just</p> <p>10 mentioned?</p> <p>11 A. I don't know.</p> <p>12 Q. To refresh, that's the Purple</p> <p>13 Trust, the Azur Trust or the Golden</p> <p>14 Venture Trust?</p> <p>15 A. (Nonverbal gesture).</p> <p>16 Q. And you don't know if any of</p> <p>17 those three own the apartment where you</p> <p>18 live?</p> <p>19 A. I don't know.</p> <p>20 Q. Where do you keep the</p> <p>21 Suburban?</p> <p>22 A. In the garage.</p> <p>23 Q. With the Aston Martin?</p> <p>24 A. No. My daughter uses it.</p> <p>25 Q. What's your daughter's car?</p>	<p>1 JANNA BULLOCK</p> <p>2 well?</p> <p>3 A. She does.</p> <p>4 Q. Does [REDACTED] own a car?</p> <p>5 A. She does.</p> <p>6 Q. What type of car is that?</p> <p>7 A. It's a Porsche Macan.</p> <p>8 Q. And then, does she own any</p> <p>9 other car besides the Porsche?</p> <p>10 A. She doesn't own this car.</p> <p>11 She uses it.</p> <p>12 Q. So me question is, does</p> <p>13 [REDACTED] own any car?</p> <p>14 A. Not that I know of.</p> <p>15 Q. Does [REDACTED] work?</p> <p>16 A. She's a student.</p> <p>17 Q. So does she make income?</p> <p>18 A. I don't know.</p> <p>19 Q. As her mother, are you aware</p> <p>20 of any income that she has?</p> <p>21 A. I don't know.</p> <p>22 Q. So no?</p> <p>23 A. I don't know.</p> <p>24 Q. You said you had another</p> <p>25 daughter.</p>
Page 167	Page 169
<p>1 JANNA BULLOCK</p> <p>2 A. She uses Suburban.</p> <p>3 Q. Does she have another car?</p> <p>4 A. I don't know. I don't know.</p> <p>5 Q. So does she live with you</p> <p>6 when she is not in school?</p> <p>7 A. I have another daughter.</p> <p>8 Q. So what is your 21-year old</p> <p>9 daughter's name?</p> <p>10 A. Twenty-nine year old.</p> <p>11 Q. Excuse me, did you say you</p> <p>12 had a 21-year old daughter?</p> <p>13 A. Yes.</p> <p>14 Q. What's her name?</p> <p>15 A. [REDACTED]</p> <p>16 Q. Does [REDACTED] go to college?</p> <p>17 A. She does.</p> <p>18 Q. When she's not at college,</p> <p>19 does she live with you?</p> <p>20 A. Yes.</p> <p>21 Q. And does she live with you in</p> <p>22 Manhattan and in Southampton?</p> <p>23 A. She lives with me in</p> <p>24 Manhattan.</p> <p>25 Q. Does she go to Southampton as</p>	<p>1 JANNA BULLOCK</p> <p>2 What's her name?</p> <p>3 A. [REDACTED]</p> <p>4 Q. And how old is [REDACTED]</p> <p>5 A. Twenty-nine.</p> <p>6 Q. Does [REDACTED] own any car?</p> <p>7 A. No.</p> <p>8 Q. Does [REDACTED] use any cars?</p> <p>9 A. Yes.</p> <p>10 Q. What are those?</p> <p>11 A. She uses Suburban and</p> <p>12 Porsche.</p> <p>13 Q. How was the Porsche obtained?</p> <p>14 MR. CUCCARO: Objection to</p> <p>15 form.</p> <p>16 A. I don't know.</p> <p>17 Q. When did you obtain the</p> <p>18 Porsche?</p> <p>19 MR. CUCCARO: Objection to</p> <p>20 form.</p> <p>21 A. I did not obtain Porsche.</p> <p>22 Q. Who obtained the Porsche?</p> <p>23 A. The trust.</p> <p>24 Q. When was the Porsche obtained</p> <p>25 by the trust?</p>

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44 (Pages 170 to 173)

Page 170

1 JANNA BULLOCK
 2 A. I don't know.
 3 Q. What trust?
 4 A. I don't know.
 5 Q. If you wanted to get
 6 information about the trust that
 7 obtained the Porsche, how would you do
 8 so?
 9 A. I don't know.
 10 Q. So if you have any questions
 11 about any of the trust, what would you
 12 do?
 13 A. I don't want to know anything
 14 about the trust.
 15 Q. So do you think you have any
 16 obligations under any laws to know what
 17 occurs with some of your trusts?
 18 MR. CUCCARO: Objection to
 19 form.
 20 A. I don't want to know.
 21 Q. I understand you don't want
 22 to know, but have you had occasion
 23 where you needed to find information
 24 out anything held in any trust?
 25 A. I don't know.

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1 JANNA BULLOCK
 2 A. Yes.
 3 Q. How'd you pay for her private
 4 school?
 5 A. The trust paid.
 6 Q. What trust?
 7 A. I don't know.
 8 Q. Do you employ any domestic
 9 servants in your house in New York?
 10 A. No.
 11 Q. In your house in Southampton?
 12 A. No.
 13 Q. You have no housekeeper?
 14 A. No.
 15 Q. No cook?
 16 A. No. My daughter is a cook.
 17 My mother helps me clean.
 18 Q. Okay. Ms. Bullock, could you
 19 estimate for me your monthly expenses?
 20 A. I don't know.
 21 Q. Estimate please.
 22 A. I can't.
 23 Q. So break it down.
 24 How much do you think you
 25 spend on clothing?

Page 171

1 JANNA BULLOCK
 2 Q. Have you ever reached back
 3 out to Samuel Pizar to ask him any
 4 question about any trust?
 5 A. No.
 6 Q. Have you ever reached back
 7 out to Mr. Papas to ask him any
 8 question about any trust?
 9 A. No.
 10 Q. Do you pay for any parking in
 11 the City for any vehicle?
 12 A. No.
 13 Q. What about your 21-year old
 14 daughter's tuition.
 15 Do you pay for that?
 16 A. No.
 17 Q. Who does?
 18 A. I don't know.
 19 Q. Did she go to private school
 20 when she was -- prior to college?
 21 A. Yes.
 22 Q. So she was under 18 at that
 23 time?
 24 A. Yes.
 25 Q. You're her guardian?

Page 173

1 JANNA BULLOCK
 2 A. I don't know.
 3 Q. Give me a ballpark.
 4 A. I don't know.
 5 Q. More than \$5,000 in a month?
 6 A. I don't know.
 7 Q. If you looked back at your
 8 purchases last month on clothing, could
 9 you give me a sense of what those would
 10 entail?
 11 A. No.
 12 Q. What about jewelry?
 13 A. No.
 14 Q. Have you purchased any
 15 jewelry in the past year?
 16 A. No.
 17 Q. Ms. Bullock, does anybody owe
 18 you money?
 19 A. I don't know.
 20 Q. Has anybody owed you money
 21 since August 2012?
 22 A. I don't know.
 23 Q. Do you receive any payments
 24 on any routine basis, for example,
 25 rent?

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45 (Pages 174 to 177)

Page 174	Page 176
<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. Have you at any point since</p> <p>4 August 2012?</p> <p>5 A. No.</p> <p>6 Q. What about payments under a</p> <p>7 lease.</p> <p>8 Have you received any since</p> <p>9 2012?</p> <p>10 A. No.</p> <p>11 Q. You have no investments; is</p> <p>12 that correct?</p> <p>13 A. Yes.</p> <p>14 Q. Do you maintain any 401(k)s?</p> <p>15 A. No.</p> <p>16 Q. Roth IRA?</p> <p>17 A. No.</p> <p>18 Q. Mutual funds?</p> <p>19 A. No.</p> <p>20 Q. Have you at any point since</p> <p>21 August 2012?</p> <p>22 A. Never.</p> <p>23 Q. What about publicly traded</p> <p>24 stock.</p> <p>25 Do you own any?</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. Ms. Bullock, does your mother</p> <p>3 maintain investment accounts?</p> <p>4 A. I don't know.</p> <p>5 Q. Does your daughter [REDACTED]</p> <p>6 maintain investment accounts?</p> <p>7 A. I don't know.</p> <p>8 Q. Does your daughter [REDACTED]</p> <p>9 maintain investment accounts?</p> <p>10 A. I don't know.</p> <p>11 Q. You said you borrow money</p> <p>12 from your mother and from your</p> <p>13 daughter.</p> <p>14 Was it [REDACTED]</p> <p>15 A. Yes.</p> <p>16 Q. When you borrow money from</p> <p>17 your mother, do you pay it back?</p> <p>18 A. No.</p> <p>19 Q. How much money do you take</p> <p>20 from your mother in a given year?</p> <p>21 A. I don't know.</p> <p>22 Q. Give me a sense.</p> <p>23 A. I don't know.</p> <p>24 Q. More than 50,000?</p> <p>25 A. No.</p>
Page 175	Page 177
<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. Have you at any point since</p> <p>4 August 2012?</p> <p>5 A. No.</p> <p>6 Q. Do you understand what I mean</p> <p>7 by a publicly traded stock?</p> <p>8 A. Yes.</p> <p>9 Q. What about any not publicly</p> <p>10 traded stock.</p> <p>11 Do you own any?</p> <p>12 A. No.</p> <p>13 Q. Have you since August 2012?</p> <p>14 A. No.</p> <p>15 Q. What about government bonds.</p> <p>16 Down own any?</p> <p>17 A. No.</p> <p>18 Q. Have you since August 2012?</p> <p>19 A. No.</p> <p>20 Q. Okay. Corporate bonds.</p> <p>21 Have you owned any since</p> <p>22 August 2012?</p> <p>23 A. No.</p> <p>24 Q. Do you own any currently?</p> <p>25 A. No.</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. So it's less than \$50,000 a</p> <p>3 year?</p> <p>4 A. Yes.</p> <p>5 Q. Does that fund your</p> <p>6 lifestyle?</p> <p>7 A. I don't know.</p> <p>8 Q. Does the money you get from</p> <p>9 your mom cover all the expenses</p> <p>10 associated with your life?</p> <p>11 A. I don't know.</p> <p>12 Q. So it's under 50,000 that you</p> <p>13 borrow from your mom or you get from</p> <p>14 your mother.</p> <p>15 Is it all in cash?</p> <p>16 A. No.</p> <p>17 Q. What other forms does it</p> <p>18 take?</p> <p>19 A. I don't know.</p> <p>20 Q. What --</p> <p>21 A. I don't know.</p> <p>22 Q. So you go to your mother, you</p> <p>23 say you're going out to dinner, you</p> <p>24 need cash, and she will what?</p> <p>25 How does she provide it to</p>

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46 (Pages 178 to 181)

Page 178

1 JANNA BULLOCK
 2 you?
 3 A. Usually people pay for my
 4 dinner.
 5 Q. Okay. Are there instances
 6 where you pay for your own?
 7 A. I don't eat much and I use
 8 Subway.
 9 Q. Do you ever treat people to
 10 dinner, host them?
 11 A. When my daughter cooks.
 12 Q. You never pick up a bill at a
 13 restaurant?
 14 A. I don't know.
 15 Q. I'm asking, do you?
 16 A. I don't remember.
 17 Q. You don't remember the last
 18 time you picked up a bill at a
 19 restaurant?
 20 A. I don't remember.
 21 Q. How many times a week do you
 22 get money from your mother?
 23 A. I don't know.
 24 Q. Estimate.
 25 A. Once a month. Twice a month.

Page 180

1 JANNA BULLOCK
 2 Q. Have you ever -- and put
 3 aside legal counsel -- do you believe
 4 or have you been told by a bank that
 5 you present a money laundering risk?
 6 A. No. I've never been told
 7 that.
 8 Q. So what's the basis for your
 9 belief that a bank won't open an
 10 account for you?
 11 A. I received a letter saying
 12 that -- from the bank saying -- that's
 13 what letter said -- from time to time,
 14 we review our client list, and we find
 15 it inconvenient to provide you with the
 16 banking services. Something like that.
 17 Q. What bank provided you that
 18 letter?
 19 A. Citibank.
 20 Q. And this is back in 1991?
 21 A. No.
 22 Q. When was this?
 23 A. Probably 2012, 2011. I don't
 24 remember exactly.
 25 Q. So you had a Citibank until

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1 JANNA BULLOCK
 2 Q. And does she give you cash?
 3 A. Yes.
 4 Q. Does she give you anything
 5 other than cash?
 6 A. No.
 7 Q. And your daughter, [REDACTED]
 8 A. Yes.
 9 Q. How often do you take money
 10 from her?
 11 A. I don't know.
 12 Q. Ms. Bullock, why don't you
 13 open a bank account?
 14 A. Because after I was trashed
 15 by Russians and my name was like put in
 16 the mud, and there is not one thing
 17 that opens a bank account for me.
 18 (Reporter clarification.)
 19 A. There's no bank that opens a
 20 bank account for me.
 21 Q. Are you aware if you're a
 22 specially designated person?
 23 A. What is this?
 24 Q. It's a term.
 25 A. I don't know what this is.

Page 181

1 JANNA BULLOCK
 2 2011, 2012?
 3 A. Yes. Something like that.
 4 Q. At any point since
 5 August 2012, have you owned any other
 6 property in Manhattan?
 7 A. No.
 8 Q. What about property that you
 9 were renovating or restoring?
 10 A. I never owned them.
 11 Q. So who owned them?
 12 A. They were in a trust.
 13 Q. Are you using the word trust
 14 generally to mean something that isn't
 15 you personally?
 16 MR. CUCCARO: Objection to
 17 form.
 18 Q. What do you mean a trust?
 19 What do you understand a
 20 trust to be?
 21 A. A trust, it's a -- I never
 22 personally owned the property and it
 23 was -- the one that was acquired was
 24 put in a trust.
 25 Q. So do you also understand

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47 (Pages 182 to 185)

Page 182	Page 184
<p>1 JANNA BULLOCK</p> <p>2 that there are entities or LLCs, often,</p> <p>3 that could own property?</p> <p>4 A. That's true. I do understand</p> <p>5 that.</p> <p>6 Q. And do you have control of</p> <p>7 any entities that own real estate in</p> <p>8 Manhattan?</p> <p>9 A. No.</p> <p>10 Q. Have you ever since</p> <p>11 August 2012 controlled entities that</p> <p>12 have real property in Manhattan?</p> <p>13 A. No.</p> <p>14 Q. What about anywhere else in</p> <p>15 the United States?</p> <p>16 A. No.</p> <p>17 Q. Anywhere in France?</p> <p>18 A. No. Personally, I never</p> <p>19 owned anything.</p> <p>20 Q. I'm going to provide you what</p> <p>21 we'll mark as Exhibit 12, please.</p> <p>22 (Whereupon, a February 28,</p> <p>23 2011 e-mail was marked as Bullock</p> <p>24 Exhibit 12 for Identification.)</p> <p>25 Q. So now providing you what's</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. Do you know what his process</p> <p>3 was for retaining bills and compiling</p> <p>4 this payables spreadsheet?</p> <p>5 A. He would collect the bills.</p> <p>6 Q. How'd he get the bills?</p> <p>7 A. How does he get the bills?</p> <p>8 Q. Yeah. Or how did he get the</p> <p>9 bills?</p> <p>10 A. I guess he would collect</p> <p>11 them.</p> <p>12 Q. From who?</p> <p>13 A. From the address they were</p> <p>14 sent.</p> <p>15 Q. He references speaking with</p> <p>16 Richard Moon who is pretty upset.</p> <p>17 Who is Richard Moon?</p> <p>18 A. He was a project manager.</p> <p>19 Q. For what property?</p> <p>20 A. Fourteen East 82nd.</p> <p>21 Q. Why was he upset?</p> <p>22 A. Or 412 East 82nd. Because</p> <p>23 there was no money to do the work.</p> <p>24 Q. So you owed him that money?</p> <p>25 A. I don't remember.</p>
Page 183	Page 185
<p>1 JANNA BULLOCK</p> <p>2 been marked as Exhibit 12.</p> <p>3 Please take a minute to</p> <p>4 review Exhibit 12.</p> <p>5 A. Okay.</p> <p>6 Q. Are you familiar with the</p> <p>7 exhibit marked Exhibit 12?</p> <p>8 A. No.</p> <p>9 Q. Okay.</p> <p>10 MS. DONOVAN: For the record,</p> <p>11 it's a February 28, 2011, e-mail</p> <p>12 from Randall Brockett to Janna</p> <p>13 Bullock, entitled current</p> <p>14 payables.</p> <p>15 Q. Now, Ms. Bullock, Randall</p> <p>16 says, "Attached are the current</p> <p>17 payables."</p> <p>18 What did you understand him</p> <p>19 to mean by payables?</p> <p>20 A. These are bills that are</p> <p>21 supposed to be paid.</p> <p>22 Q. And so you testified that</p> <p>23 Randall Brockett was your assistant,</p> <p>24 correct?</p> <p>25 A. Yes.</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. At this point in time in</p> <p>3 February 2011, you were still operating</p> <p>4 a real estate development business or a</p> <p>5 renovations business, correct?</p> <p>6 A. I was probably trying.</p> <p>7 Q. So tell me the process by</p> <p>8 which you would pay a project manager.</p> <p>9 A. I don't remember.</p> <p>10 Q. So Richard Moon, he says,</p> <p>11 here's a bill for last month's work.</p> <p>12 It's \$280,000.</p> <p>13 Does he provide that bill to</p> <p>14 you?</p> <p>15 A. Most likely he provide it to</p> <p>16 Randall. Otherwise, he would have</p> <p>17 mentioned it to me.</p> <p>18 Q. Okay. Let's go to the</p> <p>19 attachment.</p> <p>20 A. Mm hm.</p> <p>21 Q. So about five lines down,</p> <p>22 there's a New York City Department of</p> <p>23 Finance taxes in the amount of</p> <p>24 \$43,728.20 in connection with the</p> <p>25 property [REDACTED]</p>

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48 (Pages 186 to 189)

Page 186

1 JANNA BULLOCK
 2 That's your home, correct?
 3 A. Yes.
 4 Q. Did you pay that tax bill?
 5 A. It was paid by the trust.
 6 Q. Again, what trust?
 7 A. I don't remember.
 8 Q. So Randall sends this to you,
 9 not the trustee, correct?
 10 A. I don't know. Maybe he sends
 11 it to me to be sent to the trustee.
 12 Q. So he says in the first page,
 13 "I know most of it has to wait, but let
 14 me know which you want to pay, and I'll
 15 send to Stuart."
 16 He's asking you for payment
 17 instructions, correct?
 18 A. I don't know what he's
 19 asking.
 20 Q. Well, you received this
 21 e-mail, correct?
 22 A. Yes.
 23 Q. And you understood he's
 24 saying, let me know what you want to
 25 pay, correct?

Page 188

1 JANNA BULLOCK
 2 A. I don't remember.
 3 Q. For what period of time was
 4 he a trustee?
 5 A. I don't remember.
 6 Q. Anybody else who was a
 7 trustee?
 8 A. Papas was a trustee before.
 9 Q. Before Stuart?
 10 A. Mm hm.
 11 Q. For what period of time?
 12 A. I don't remember.
 13 Q. Anybody else?
 14 A. Yes, Stuart Sundlun.
 15 Q. And who is Stuart Sundlun?
 16 A. He's a friend.
 17 Q. And he's the trustee of what
 18 trust?
 19 A. I don't remember. The one
 20 that I mentioned. For the trust of the
 21 kids.
 22 Q. What's your understanding of
 23 your children's ability to receive the
 24 benefits of the trust?
 25 A. I don't remember.

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1 JANNA BULLOCK
 2 A. I don't know. The trustee
 3 was paying the bills.
 4 Q. Did you communicate to the
 5 trustee which to pay?
 6 A. I think that he communicated
 7 to the trustee, yeah.
 8 Q. How would he communicate with
 9 the trustee?
 10 A. I don't know.
 11 Q. Did you ever ask him?
 12 A. I haven't. I don't remember.
 13 Q. Are you aware of the
 14 trustee -- of a trustee in connection
 15 with any of the trusts that you've
 16 established.
 17 A. I didn't understand the
 18 question.
 19 Q. Do you know the identity of a
 20 single trustee overseeing any of the
 21 trusts you've established?
 22 A. Stuart Smith.
 23 Q. Was a trustee?
 24 A. Was a trustee.
 25 Q. Of which trust?

Page 189

1 JANNA BULLOCK
 2 Q. Do your children receive any
 3 income from any trust currently?
 4 A. I don't know.
 5 Q. Does the trust hold any -- do
 6 the trust hold any investment that pays
 7 them investment income?
 8 A. I don't know.
 9 Q. So you said the purpose of
 10 the trust was to settle up for your
 11 children, correct?
 12 A. Yes.
 13 Q. And what did you intend to do
 14 by that?
 15 A. That they will be taken care
 16 of.
 17 Q. Do your children have access
 18 to the assets currently?
 19 A. I don't know.
 20 Q. So if your 21-year old
 21 daughter wanted to draw from one of the
 22 trusts, you don't know if she can or
 23 not?
 24 A. I don't know.
 25 Q. Has she ever tried to?

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49 (Pages 190 to 193)

<p style="text-align: right;">Page 190</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. Is she aware of the formation</p> <p>4 of the trust?</p> <p>5 A. I don't know.</p> <p>6 Q. Did you tell your children</p> <p>7 that they have available to them trust?</p> <p>8 A. I didn't tell them anything.</p> <p>9 Q. So were they aware of the</p> <p>10 trust in their ostensible benefit?</p> <p>11 MR. CUCCARO: Objection to</p> <p>12 form.</p> <p>13 A. I don't know.</p> <p>14 Q. Have you personally ever told</p> <p>15 your daughter [REDACTED] that you've</p> <p>16 created trust for her benefit?</p> <p>17 MR. CUCCARO: Objection to</p> <p>18 form.</p> <p>19 MS. DONOVAN: You can answer.</p> <p>20 A. Yes.</p> <p>21 Q. Okay. What did you tell her</p> <p>22 about those trust?</p> <p>23 A. Nothing else.</p> <p>24 Q. What did you tell her?</p> <p>25 A. That there was a trust</p>	<p style="text-align: right;">Page 192</p> <p>1 JANNA BULLOCK</p> <p>2 these trust?</p> <p>3 A. I don't remember.</p> <p>4 Q. When did you tell her about</p> <p>5 these trust?</p> <p>6 A. I don't remember.</p> <p>7 Q. Have you had other</p> <p>8 conversations with her about these</p> <p>9 trust?</p> <p>10 A. I don't remember.</p> <p>11 Q. Do you have a will?</p> <p>12 A. No.</p> <p>13 Q. Do you have any other estate</p> <p>14 plans?</p> <p>15 A. No.</p> <p>16 Q. All right. Looks like there</p> <p>17 is halfway down the page, an entry for</p> <p>18 164 Cook Street. The vendor is 900</p> <p>19 Grand Street Milk LLC. The purpose is</p> <p>20 rent in the amount, \$11,997.49.</p> <p>21 What's that payable?</p> <p>22 A. That's a rent for the</p> <p>23 storage.</p> <p>24 Q. For the storage of what?</p> <p>25 A. I've done a lot of show</p>
<p style="text-align: right;">Page 191</p> <p>1 JANNA BULLOCK</p> <p>2 established for they benefit.</p> <p>3 Q. How old was she when you told</p> <p>4 her this?</p> <p>5 A. I don't remember.</p> <p>6 Q. Roughly, how long ago was</p> <p>7 this?</p> <p>8 A. I don't remember.</p> <p>9 Q. Roughly?</p> <p>10 A. I don't know.</p> <p>11 Q. Okay. Was it 12 years ago?</p> <p>12 A. I don't know.</p> <p>13 Q. Was it 15?</p> <p>14 A. I don't know.</p> <p>15 Q. Was she a child when you told</p> <p>16 her?</p> <p>17 A. I don't remember.</p> <p>18 Q. Was she old enough to</p> <p>19 appreciate what you were telling her?</p> <p>20 A. I don't remember.</p> <p>21 Q. And then your daughter [REDACTED]</p> <p>22 did you ever tell her about any of</p> <p>23 these trust?</p> <p>24 A. Yes.</p> <p>25 Q. What did you tell her about</p>	<p style="text-align: right;">Page 193</p> <p>1 JANNA BULLOCK</p> <p>2 houses. So there was -- there is lot</p> <p>3 of furniture accumulated from the show</p> <p>4 houses.</p> <p>5 Q. Do you know if that's an</p> <p>6 annual charge or is that monthly or</p> <p>7 what frequency?</p> <p>8 A. It's probably annual.</p> <p>9 Q. Do you know if that \$11,990</p> <p>10 was paid?</p> <p>11 A. I don't know.</p> <p>12 Q. Look like there's a common</p> <p>13 charge in connection with the Plaza</p> <p>14 Condo 615. The vendor is listed Cooper</p> <p>15 Square Realty Inc., in the amount -- or</p> <p>16 common charges in the amount of</p> <p>17 \$14,675.</p> <p>18 A. Right.</p> <p>19 Q. Was that paid?</p> <p>20 A. I don't know.</p> <p>21 Q. What's the Plaza Condo 615?</p> <p>22 A. That's a property.</p> <p>23 Q. Where?</p> <p>24 A. It says Plaza Condo.</p> <p>25 Q. So is it in the Plaza?</p>

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50 (Pages 194 to 197)

Page 194	Page 196
<p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. You received this spreadsheet</p> <p>4 from Randall Brockett, correct?</p> <p>5 A. Yes. I received a lot of</p> <p>6 stuff from Randall Brockett.</p> <p>7 Q. And he was asking you to let</p> <p>8 him know which you wanted to pay.</p> <p>9 Did you review this</p> <p>10 spreadsheet?</p> <p>11 A. I don't remember.</p> <p>12 Q. Was it your practice to</p> <p>13 review spreadsheets sent to you asking</p> <p>14 for your confirmation of payment?</p> <p>15 A. I don't remember.</p> <p>16 Q. Going further down, you'll</p> <p>17 see the house at 210 Meadow Lane. The</p> <p>18 village taxes are listed as \$31,164.60.</p> <p>19 Were those paid?</p> <p>20 A. I don't know.</p> <p>21 Q. And you understood that</p> <p>22 Randall was reaching out to you, not a</p> <p>23 trust, about the payment of those</p> <p>24 taxes?</p> <p>25 A. I assume. It says that he</p>	<p>1 JANNA BULLOCK</p> <p>2 a whole slew of entries in connection</p> <p>3 with a project at 54 East 64 Street</p> <p>4 LLC.</p> <p>5 What's the 54 East 64th</p> <p>6 Street LLC?</p> <p>7 A. It's a building.</p> <p>8 Q. Okay. Is it the building or</p> <p>9 is it the entity?</p> <p>10 A. Both.</p> <p>11 Q. Okay. Did you own the</p> <p>12 building at 54 East 64th Street at any</p> <p>13 point in time?</p> <p>14 A. The trust owned it.</p> <p>15 Q. What trust?</p> <p>16 A. One of the trusts that was</p> <p>17 set up for the benefit of my children.</p> <p>18 Q. Did the LLC own the building</p> <p>19 at 54 East 64th Street?</p> <p>20 A. I don't know.</p> <p>21 Q. All right. So it's saying</p> <p>22 the property tax on the property at 12</p> <p>23 East 82nd Street were due in the amount</p> <p>24 of \$43,840.</p> <p>25 Were those paid?</p>
Page 195	Page 197
<p>1 JANNA BULLOCK</p> <p>2 was reaching out to the trust as</p> <p>3 well -- to the trustee as well.</p> <p>4 Q. You say you assumed he's</p> <p>5 reaching out?</p> <p>6 A. That's my second language.</p> <p>7 English is my second language.</p> <p>8 Q. I'm not trying to parse the</p> <p>9 language. I just need to be clear</p> <p>10 about what you mean.</p> <p>11 Do you have a reason to</p> <p>12 believe he was sending this to the</p> <p>13 trustee, a trustee as well?</p> <p>14 A. Yes.</p> <p>15 Q. And what is that reason?</p> <p>16 A. I don't know.</p> <p>17 Q. Looks like town taxes on the</p> <p>18 property at 210 Meadow Lane are in the</p> <p>19 amount of \$48,658.74.</p> <p>20 Did you pay those?</p> <p>21 A. I don't know.</p> <p>22 Q. Again, did you forward them</p> <p>23 to a trustee for payment?</p> <p>24 A. I don't know.</p> <p>25 Q. All right. Next, you'll see</p>	<p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. So if you want to pay these,</p> <p>4 do you go to your mother?</p> <p>5 A. These are trust properties</p> <p>6 and it goes to the trustee.</p> <p>7 Q. Any document that you could</p> <p>8 point me towards that shows something</p> <p>9 like this going to the trustee?</p> <p>10 MR. CUCCARO: Objection to</p> <p>11 form.</p> <p>12 A. That's what the -- that's</p> <p>13 what the e-mail says. I'll send to</p> <p>14 Stuart.</p> <p>15 Q. Okay. And Stuart was acting</p> <p>16 then as the trustee?</p> <p>17 A. Stuart was a trustee.</p> <p>18 Q. And if I wanted to get more</p> <p>19 information about Stuart's role as a</p> <p>20 trustee, what documents do you have in</p> <p>21 your possession that can tell me about</p> <p>22 Stuart's role as a trustee?</p> <p>23 A. I don't know. He was a</p> <p>24 trustee.</p> <p>25 Q. You understand there would be</p>

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51 (Pages 198 to 201)

Page 198	Page 200
<p>1 JANNA BULLOCK</p> <p>2 records made in connection with his</p> <p>3 serving as a trustee?</p> <p>4 A. I'm very bad with records. I</p> <p>5 don't keep records.</p> <p>6 Q. Okay. And who would keep</p> <p>7 records about who was serving as</p> <p>8 trustees?</p> <p>9 MR. CUCCARO: Objection.</p> <p>10 A. Stuart. Stuart would have</p> <p>11 those records.</p> <p>12 Q. So name --</p> <p>13 A. An attorney who set up the</p> <p>14 trust would have record.</p> <p>15 Q. Okay. Any people that you</p> <p>16 pay or work with -- strike that.</p> <p>17 Can you list for me the</p> <p>18 people who have, since August 2012,</p> <p>19 maintained records for you?</p> <p>20 A. Stuart Smith maintained</p> <p>21 records.</p> <p>22 Q. Yup. Who else?</p> <p>23 A. I don't know. The records</p> <p>24 were in e-mail.</p> <p>25 Q. Whose e-mail?</p>	<p>1 JANNA BULLOCK</p> <p>2 A. I don't remember.</p> <p>3 Q. On the second page, there's</p> <p>4 an Eastern Savings Bank, a mortgage for</p> <p>5 \$30,259. That's being listed in</p> <p>6 connection with a property at 34 East</p> <p>7 62nd Street.</p> <p>8 A. Right.</p> <p>9 Q. What property is that?</p> <p>10 A. It was a property that I was</p> <p>11 trying to develop.</p> <p>12 Q. Okay. You were trying to</p> <p>13 develop it, and then did you sell it?</p> <p>14 A. The trust sold it.</p> <p>15 Q. Now, bottom of the page.</p> <p>16 2170 Meadow Lane. It looks like you</p> <p>17 have half of the taxes for 2010, 2011</p> <p>18 due in the amount of \$31,012.</p> <p>19 Do you know if these were</p> <p>20 paid?</p> <p>21 A. I don't know.</p> <p>22 Q. And do you know how they were</p> <p>23 paid?</p> <p>24 A. The trustee paid it.</p> <p>25 Q. So did Stuart Smith -- it</p>
Page 199	Page 201
<p>1 JANNA BULLOCK</p> <p>2 A. My e-mail.</p> <p>3 Q. Okay. What records are you</p> <p>4 thinking of?</p> <p>5 A. I'm not think of anything.</p> <p>6 But if there are records, they should</p> <p>7 be in the e-mail.</p> <p>8 Q. Records concerning the</p> <p>9 trustees?</p> <p>10 A. The lawyers would have</p> <p>11 records.</p> <p>12 Q. So in response to Randall's</p> <p>13 e-mail to let me know which you want to</p> <p>14 pay, did you do anything?</p> <p>15 A. I don't remember.</p> <p>16 Q. Did you let him know any of</p> <p>17 these that he should pay?</p> <p>18 A. I don't remember. It was</p> <p>19 really long time ago.</p> <p>20 Q. Okay. Did you receive these</p> <p>21 from Randall on any other occasions?</p> <p>22 A. I don't remember.</p> <p>23 Q. And did you have any practice</p> <p>24 in receiving these documents and</p> <p>25 instructing him what to pay?</p>	<p>1 JANNA BULLOCK</p> <p>2 looks like these all sum to a total of</p> <p>3 \$2,578,058, these different payables.</p> <p>4 Did Stuart Smith have access</p> <p>5 to over two and a half million dollars</p> <p>6 with which to pay all the amounts owed</p> <p>7 by you?</p> <p>8 A. I don't know.</p> <p>9 MS. DONOVAN: Okay. So we'll</p> <p>10 call this Exhibit 13, please.</p> <p>11 (Whereupon, an e-mail</p> <p>12 correspondence was marked as</p> <p>13 Defendant's Exhibit 13 for</p> <p>14 Identification.)</p> <p>15 Q. Please take a look at Exhibit</p> <p>16 13.</p> <p>17 Do you recognize Exhibit 13?</p> <p>18 A. No.</p> <p>19 Q. Okay.</p> <p>20 MS. DONOVAN: For the record,</p> <p>21 it's an e-mail from Randall</p> <p>22 Brockett to Janna Bullock on</p> <p>23 June 29, 2013, entitled, May, June</p> <p>24 payables, attaching a list of</p> <p>25 payables at Page 2, the list of</p>

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52 (Pages 202 to 205)

Page 202	Page 204
<p>1 JANNA BULLOCK</p> <p>2 payables.</p> <p>3 Q. It's disclosing a property</p> <p>4 tax of \$92,521 in connection with the</p> <p>5 penthouse apartment where you live</p> <p>6 currently.</p> <p>7 Do you see where I'm looking?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know if that amount</p> <p>10 was paid?</p> <p>11 A. I don't know.</p> <p>12 Q. Now, he doesn't indicate in</p> <p>13 this e-mail that he's sending the same</p> <p>14 spreadsheet to Stuart.</p> <p>15 Do you have an understanding</p> <p>16 of why he sent this to you personally?</p> <p>17 A. I don't know.</p> <p>18 Q. Did you typically review your</p> <p>19 expenses on a monthly or bimonthly</p> <p>20 basis?</p> <p>21 A. These are not my expenses.</p> <p>22 Q. Whose expenses are they?</p> <p>23 A. These are trust expenses.</p> <p>24 Q. Okay. Now, in the body of</p> <p>25 the e-mail it says, "Here are the</p>	<p>1 JANNA BULLOCK</p> <p>2 A. It was a nanny.</p> <p>3 Q. A nanny for who?</p> <p>4 A. For my grandchildren.</p> <p>5 Q. Okay. So do you pay her</p> <p>6 expenses?</p> <p>7 A. The trust pays her expenses.</p> <p>8 Q. And typically, what are her</p> <p>9 expenses annually?</p> <p>10 A. I don't know.</p> <p>11 Q. Ms. Bullock, this also</p> <p>12 discloses village taxes for the</p> <p>13 property at 2170 Meadow Lane in the</p> <p>14 amount of \$33,903.</p> <p>15 During this point, you were</p> <p>16 acting as the manager for this</p> <p>17 property; is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And one of your</p> <p>20 responsibilities then was the</p> <p>21 responsibility for the payment of</p> <p>22 taxes?</p> <p>23 A. I never pay taxes for 2170.</p> <p>24 That was responsibility for the</p> <p>25 trustee. My responsibility would be to</p>
Page 203	Page 205
<p>1 JANNA BULLOCK</p> <p>2 payables I have to date, not including</p> <p>3 the Barneys or CeCe expenses."</p> <p>4 What did you understand him</p> <p>5 to mean which the Barney's expenses?</p> <p>6 A. Somebody shopped in Barney's.</p> <p>7 Q. And it's your view that those</p> <p>8 are also expenses of the trust?</p> <p>9 A. I don't know.</p> <p>10 Q. Do you shop at Barney's</p> <p>11 Ms. Bullock?</p> <p>12 A. Not recently.</p> <p>13 Q. Ms. Bullock, at any time</p> <p>14 since August 2012, have you shopped at</p> <p>15 Barney's?</p> <p>16 This isn't a hard question,</p> <p>17 and we've remained under oath as we</p> <p>18 have since the beginning.</p> <p>19 A. Probably.</p> <p>20 Q. Probably? You have no</p> <p>21 definitive memory of walking through</p> <p>22 the doors of Barney's and buying</p> <p>23 anything?</p> <p>24 A. I might.</p> <p>25 Q. What's CeCe's?</p>	<p>1 JANNA BULLOCK</p> <p>2 make sure that the house is in working</p> <p>3 order.</p> <p>4 Q. Did you ever speak with a</p> <p>5 trustee about the property at 2170</p> <p>6 Meadow Lane?</p> <p>7 A. I don't recall.</p> <p>8 Q. How did you learn what your</p> <p>9 responsibilities were supposed to have</p> <p>10 been then as the house manager?</p> <p>11 A. The responsibility is</p> <p>12 obviously the house has to function.</p> <p>13 Q. So who let you know you could</p> <p>14 stay there?</p> <p>15 If you don't own the place,</p> <p>16 why are you staying there?</p> <p>17 A. I stayed there with my</p> <p>18 children.</p> <p>19 Q. Yeah. But what's the basis?</p> <p>20 I don't own that house.</p> <p>21 Could I stay there?</p> <p>22 A. I don't know.</p> <p>23 Q. You appreciate something</p> <p>24 needs to allow you to know that you can</p> <p>25 stay in a place.</p>

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Page 206	Page 208
<p>1 JANNA BULLOCK</p> <p>2 What allowed you to know that</p> <p>3 you could stay in 2170?</p> <p>4 MR. CUCCARO: Objection to</p> <p>5 form.</p> <p>6 A. It's a house for my children.</p> <p>7 Maybe they want me there. I take care</p> <p>8 of grandchildren.</p> <p>9 Q. And remind me, when did the</p> <p>10 trust acquire 2170 Meadow Lane?</p> <p>11 A. I don't remember the year.</p> <p>12 Q. Before the birth of your</p> <p>13 children?</p> <p>14 A. After the births of my</p> <p>15 children.</p> <p>16 Q. Ms. Bullock, do you own any</p> <p>17 art?</p> <p>18 A. I -- trust owns some art.</p> <p>19 Q. You personally don't own any</p> <p>20 art?</p> <p>21 A. Not anymore.</p> <p>22 Q. Since when?</p> <p>23 A. I don't know.</p> <p>24 Q. Roughly?</p> <p>25 A. I don't know.</p>	<p>1 JANNA BULLOCK</p> <p>2 has assembled some 4,000 works by</p> <p>3 Russian artists," according to a press</p> <p>4 release about the appointment.</p> <p>5 Did you assemble a collection</p> <p>6 of 4,000 works by Russian artists?</p> <p>7 A. My husband had -- my</p> <p>8 ex-husband owned an exceptional book</p> <p>9 collection of rare books. So I would</p> <p>10 just suggest that this is just</p> <p>11 misinterpretation of the extensive book</p> <p>12 collection that he owns. It was</p> <p>13 probably in the amount of 4,000 books.</p> <p>14 Q. So you believe you were</p> <p>15 appointed to the Guggenheim board, not</p> <p>16 because you had a personal interest and</p> <p>17 had personally put together a large art</p> <p>18 collection, but because your husband --</p> <p>19 ex-husband collected rare books?</p> <p>20 MR. CUCCARO: Objection to</p> <p>21 form.</p> <p>22 A. We also had some art.</p> <p>23 Q. Okay. How much art?</p> <p>24 A. It's hard to say now.</p> <p>25 Q. Any painters we would know?</p>
Page 207	Page 209
<p>1 JANNA BULLOCK</p> <p>2 Q. I need an approximation.</p> <p>3 A. I don't know.</p> <p>4 Q. Was it in the last 10 years?</p> <p>5 A. Probably.</p> <p>6 MS. DONOVAN: All right.</p> <p>7 I'll produce you with what's been</p> <p>8 marked as Exhibit 14. Excuse me.</p> <p>9 (Whereupon, an article was</p> <p>10 marked as Bullock Exhibit 14 for</p> <p>11 Identification.)</p> <p>12 Q. If you can take a look at the</p> <p>13 article that's been produced or that's</p> <p>14 before you as Exhibit 14.</p> <p>15 A. Okay.</p> <p>16 Q. Ms. Bullock, the article</p> <p>17 references your joining the board of</p> <p>18 trustees at the Guggenheim?</p> <p>19 A. Mm hm.</p> <p>20 Q. Do you recall joining the</p> <p>21 Guggenheim board?</p> <p>22 A. Yes.</p> <p>23 Q. It notes as well,</p> <p>24 "Ms. Bullock is no slouch when it comes</p> <p>25 to the world of art collection. She</p>	<p>1 JANNA BULLOCK</p> <p>2 Any artists we would know?</p> <p>3 A. I don't know.</p> <p>4 Q. When you say "We had some</p> <p>5 art," are you referring to you and your</p> <p>6 ex-husband?</p> <p>7 A. Yes.</p> <p>8 Q. Did you retain that art after</p> <p>9 you and your ex-husband divorced?</p> <p>10 A. No. That art was ceased</p> <p>11 by -- most of it was ceased by Russian</p> <p>12 authorities.</p> <p>13 Q. Okay. So that was art kept</p> <p>14 in Russia?</p> <p>15 A. That's where he lived.</p> <p>16 Q. Yup. And then did you own</p> <p>17 art that was kept elsewhere, outside</p> <p>18 Russia?</p> <p>19 A. Yes.</p> <p>20 Q. Where did you keep art?</p> <p>21 A. In the house I live.</p> <p>22 Q. Okay. Do you have art there</p> <p>23 currently?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Ms. Bullock, does any</p>

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54 (Pages 210 to 213)

Page 210	Page 212
<p>1 JANNA BULLOCK</p> <p>2 of that art -- is any of that art</p> <p>3 valued in excess of 10,000 Euros?</p> <p>4 A. Maybe. I don't know.</p> <p>5 Q. Okay. And if we look at</p> <p>6 documents that show Picassos or</p> <p>7 Kandinskys, will that refresh your</p> <p>8 recollection whether you own any art</p> <p>9 valued in excess of 10,000 Euros?</p> <p>10 A. That art is not owned by me.</p> <p>11 Q. And again, for the sake of</p> <p>12 clarity, who is it owned by?</p> <p>13 A. It's in a trust.</p> <p>14 Q. Okay. What trust?</p> <p>15 A. It's children trust.</p> <p>16 Q. What is the Jaze Collection?</p> <p>17 A. That was the foundation, the</p> <p>18 trust for the art.</p> <p>19 Q. And what did it do?</p> <p>20 A. It holds some art. It hosted</p> <p>21 a few exhibitions. It supported young</p> <p>22 artists.</p> <p>23 Q. What was your connection to</p> <p>24 the Jaze Collection?</p> <p>25 A. I was a settlor of the trust.</p>	<p>1 JANNA BULLOCK</p> <p>2 Exhibit Number 15, Ms. Bullock?</p> <p>3 A. This is an incorrect -- this</p> <p>4 is an incorrect fact, because the trust</p> <p>5 was only set up with me being the</p> <p>6 beneficiary -- me being a settlor, and</p> <p>7 two of my children being the</p> <p>8 beneficiary.</p> <p>9 Q. So Ms. Bullock, first, do you</p> <p>10 recognize this document?</p> <p>11 A. I don't recognize it. I just</p> <p>12 looked at the facts.</p> <p>13 Q. Okay. So it's an e-mail from</p> <p>14 May 16, 2006, from CP Palema,</p> <p>15 Papas@Palemanet.com, to a</p> <p>16 JS200005@Yahoo.com?</p> <p>17 A. This is not my e-mail.</p> <p>18 Q. It's addressed to, dear</p> <p>19 Janna?</p> <p>20 A. Mm hm.</p> <p>21 Q. Have you ever been used this</p> <p>22 e-mail?</p> <p>23 A. No.</p> <p>24 Q. Have you ever used an e-mail</p> <p>25 address that's associated with a</p>
Page 211	Page 213
<p>1 JANNA BULLOCK</p> <p>2 Q. But Jaze wasn't the trust,</p> <p>3 correct?</p> <p>4 A. It was the trust.</p> <p>5 Q. So Jaze is one of the trusts?</p> <p>6 A. Yes.</p> <p>7 Q. And Jaze holds some of the</p> <p>8 art that you're referencing?</p> <p>9 A. Yes.</p> <p>10 Q. Are you familiar with the</p> <p>11 company Southwark? S-O-U-T-H-W-A-R-K.</p> <p>12 A. No. I read it's one of the</p> <p>13 defendants.</p> <p>14 MS. DONOVAN: Can we please</p> <p>15 mark this as Exhibit 14?</p> <p>16 MR. CUCCARO: Is this 15?</p> <p>17 MS. DONOVAN: Excuse me, 15.</p> <p>18 Thank you.</p> <p>19 (Whereupon, an e-mail</p> <p>20 correspondence was marked as</p> <p>21 Bullock Exhibit 15 for</p> <p>22 Identification.)</p> <p>23 Q. There's two pages. It's an</p> <p>24 e-mail correspondence from May 2006.</p> <p>25 Could you please review</p>	<p>1 JANNA BULLOCK</p> <p>2 student named Jimmy Stewart or James</p> <p>3 Stewart?</p> <p>4 A. Never.</p> <p>5 Q. Do you know a James Stewart?</p> <p>6 A. No.</p> <p>7 Q. Ms. Bullock, if I presented</p> <p>8 you with more documents from him to you</p> <p>9 at this e-mail address, would that</p> <p>10 refresh your recollection of any use of</p> <p>11 that e-mail address?</p> <p>12 A. I believe that that's who</p> <p>13 worked for me with this e-mail. I</p> <p>14 never ever used it.</p> <p>15 Q. Okay. So who is that person?</p> <p>16 A. I never ever used this</p> <p>17 e-mail.</p> <p>18 Q. Do you know how long or for</p> <p>19 what reason the person who worked for</p> <p>20 you is communicating on this e-mail</p> <p>21 address?</p> <p>22 A. Probably to fool somebody</p> <p>23 around to do something inappropriate.</p> <p>24 Q. So this reflects that you're</p> <p>25 a settlor and a beneficiary on the</p>

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<p style="text-align: right;">Page 214</p> <p>1 JANNA BULLOCK</p> <p>2 Purple Trust?</p> <p>3 A. I was never a beneficiary of</p> <p>4 the trust, at any day or time I was the</p> <p>5 beneficiary of the trust.</p> <p>6 Q. Ms. Bullock, were you in</p> <p>7 e-mail correspondence with Mr. Papas</p> <p>8 after the creation of the trust?</p> <p>9 A. I don't think so.</p> <p>10 Q. Did you ever have Mr. Papas</p> <p>11 store art for you.</p> <p>12 A. No, not for me. And to the</p> <p>13 best of my knowledge, not for the</p> <p>14 trust.</p> <p>15 Q. And did any artwork ever go</p> <p>16 through Mr. Papas or his firm when</p> <p>17 being shipped to you?</p> <p>18 A. I don't think so.</p> <p>19 Q. Ms. Bullock, who is Frédéric</p> <p>20 Bouin? B-O-U-I-N.</p> <p>21 A. He was an art dealer.</p> <p>22 Q. And what was your</p> <p>23 relationship with Mr. Bouin?</p> <p>24 A. I knew him socially.</p> <p>25 Q. And you are aware that in</p>	<p style="text-align: right;">Page 216</p> <p>1 JANNA BULLOCK</p> <p>2 Q. And Ms. Bullock, if you want</p> <p>3 to flip through, I'll direct your</p> <p>4 attention to particular pages here.</p> <p>5 A. Mm hm.</p> <p>6 Q. Do you recognize the</p> <p>7 documents that are compiled as Exhibit</p> <p>8 16?</p> <p>9 A. I don't think I've ever seen</p> <p>10 it.</p> <p>11 Q. Okay. So if you go five</p> <p>12 pages in, Ms. Bullock, invoice ending</p> <p>13 801X -- or maybe it might be easier to</p> <p>14 identify it by little 81 up in the top</p> <p>15 right.</p> <p>16 A. (Nonverbal gesture).</p> <p>17 Q. All right. So this</p> <p>18 reflects -- it's an invoice. Appears</p> <p>19 to be for two crates. Goods type</p> <p>20 described as Kandinsky and Marakami and</p> <p>21 the shipper is the Jaze Foundation,</p> <p>22 care of this moving company. And</p> <p>23 you're listed as the consignee.</p> <p>24 Did you receive these crates</p> <p>25 of Kandinsky and Marakami paintings?</p>
<p style="text-align: right;">Page 215</p> <p>1 JANNA BULLOCK</p> <p>2 divorce proceedings between him and his</p> <p>3 ex-wife, it was alleged that you</p> <p>4 received art from Mr. Bouin?</p> <p>5 A. And we responded to that,</p> <p>6 that I did never store any art or hide</p> <p>7 any art for Mr. Bouin.</p> <p>8 Q. Ms. Bullock, are you familiar</p> <p>9 with a company, a storage and shipping</p> <p>10 company called Harsch Transports? It's</p> <p>11 in Geneva.</p> <p>12 A. It's a very big company.</p> <p>13 It's a very big moving company.</p> <p>14 Q. Okay. So it's a moving</p> <p>15 company.</p> <p>16 Have you done work with them</p> <p>17 before?</p> <p>18 A. Not personally, but I know</p> <p>19 about the company.</p> <p>20 Q. Okay.</p> <p>21 MS. DONOVAN: Can we please</p> <p>22 mark this as Exhibit 16.</p> <p>23 (Whereupon, composite</p> <p>24 documents were marked as Bullock</p> <p>25 Exhibit 16 for Identification.)</p>	<p style="text-align: right;">Page 217</p> <p>1 JANNA BULLOCK</p> <p>2 A. I don't know.</p> <p>3 Q. So look at the date. Some</p> <p>4 time around February 2008?</p> <p>5 A. Right.</p> <p>6 Q. Did you receive -- it looks</p> <p>7 like it's going to you in New York at</p> <p>8 East 67 Street, this artwork?</p> <p>9 A. Right.</p> <p>10 Q. Did you receive it?</p> <p>11 A. I don't remember.</p> <p>12 Q. Do you know what it means to</p> <p>13 be the consignee?</p> <p>14 A. No.</p> <p>15 Q. Now, if you flip the page, do</p> <p>16 you recognize this document?</p> <p>17 A. No. I never been personally</p> <p>18 involved in that.</p> <p>19 Q. What do you mean in that?</p> <p>20 A. In shipping of the art.</p> <p>21 Q. So this shipping invoice</p> <p>22 reflects a shipment from Bouin in New</p> <p>23 York to consignee J. Bullock in Geneva</p> <p>24 and Courchevel?</p> <p>25 A. Right.</p>

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Page 218	Page 220
<p>1 JANNA BULLOCK</p> <p>2 Q. And it looks like it's</p> <p>3 shipping two particular pieces of art;</p> <p>4 am I correct?</p> <p>5 A. Mm hm.</p> <p>6 Q. Did you ever receive the</p> <p>7 Kandinsky Leichter Block?</p> <p>8 A. They were ship to Courchevel.</p> <p>9 Q. Did you ever receive them in</p> <p>10 Courchevel?</p> <p>11 A. I don't know.</p> <p>12 Q. And is Courchevel where your</p> <p>13 French hotel properties are located?</p> <p>14 MR. CUCCARO: Objection to</p> <p>15 form.</p> <p>16 A. There is where French hotels</p> <p>17 are located.</p> <p>18 Q. And it's your testimony that</p> <p>19 you're not beneficial owner of those</p> <p>20 French hotels?</p> <p>21 A. No.</p> <p>22 Q. And those are Pralong in</p> <p>23 Crystal?</p> <p>24 A. No.</p> <p>25 Q. Those are not?</p>	<p>1 JANNA BULLOCK</p> <p>2 Q. And when was that?</p> <p>3 A. I don't remember.</p> <p>4 Q. Roughly?</p> <p>5 A. I don't remember.</p> <p>6 Q. When you refer to Cyprus Case</p> <p>7 1, what are you referring to?</p> <p>8 A. That was another allegation</p> <p>9 that I did something wrong in Cyprus.</p> <p>10 Q. Since August 2012, have you</p> <p>11 had any interest in Hotel Pralong?</p> <p>12 A. I don't remember.</p> <p>13 Q. Since August 2012, have you</p> <p>14 had any interest in the Hotel Crystal?</p> <p>15 A. I'm very bad with times, with</p> <p>16 dates. It's been really long time ago.</p> <p>17 So I cannot.</p> <p>18 Q. But it seems that you don't,</p> <p>19 from your testimony, personally own or</p> <p>20 you've stated that you don't personally</p> <p>21 own much.</p> <p>22 So I'm asking you to</p> <p>23 recollect the point in time where you</p> <p>24 actually owned things.</p> <p>25 A. I never personally owned</p>
Page 219	Page 221
<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. What hotels are they?</p> <p>4 MR. CUCCARO: Objection to</p> <p>5 form.</p> <p>6 Q. Ms. Bullock, when you're</p> <p>7 referencing the French hotels, which</p> <p>8 hotels are you referring to?</p> <p>9 A. Pralong and Crystal.</p> <p>10 Q. Okay. All right. And the</p> <p>11 Esser Doubt Frankreich.</p> <p>12 A. Mm hm.</p> <p>13 Q. Did you receive that</p> <p>14 property -- excuse me -- that work in</p> <p>15 either Geneva or Courchevel?</p> <p>16 A. The hotel needs to be asked.</p> <p>17 Q. So you said we need to</p> <p>18 consult the hotel to see if either of</p> <p>19 those works were received.</p> <p>20 And because your relationship</p> <p>21 to the hotel is what?</p> <p>22 A. I don't have no relationship</p> <p>23 with the hotels anymore.</p> <p>24 Q. Since when?</p> <p>25 A. Since Cyprus Case 1 was over.</p>	<p>1 JANNA BULLOCK</p> <p>2 those hotels.</p> <p>3 Q. Were you the beneficial owner</p> <p>4 of those hotels?</p> <p>5 A. I don't think so.</p> <p>6 Q. Now, Ms. Bullock, if you</p> <p>7 continue looking through this, you'll</p> <p>8 see a whole host of art shipping to</p> <p>9 you. One -- this is the Page 109 in</p> <p>10 the top right corner. It reflects Egon</p> <p>11 Schiele, four works, and two cases</p> <p>12 going to consignee Janna Bullock at the</p> <p>13 Chalet Santa Maria in Gstaad,</p> <p>14 G-S-T-A-A-D.</p> <p>15 A. Mm hm.</p> <p>16 Q. Do you own property in</p> <p>17 Gstaad?</p> <p>18 A. The trust owns property in</p> <p>19 Gstaad.</p> <p>20 Q. And which trust owns property</p> <p>21 in Gstaad?</p> <p>22 A. One of the trusts that was</p> <p>23 mentioned before.</p> <p>24 Q. Did you have any documents in</p> <p>25 your possession concerning the property</p>

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<p style="text-align: right;">Page 222</p> <p>1 JANNA BULLOCK</p> <p>2 in Gstaad?</p> <p>3 A. No.</p> <p>4 Q. Now, here it appears, at the</p> <p>5 Page 117 in the top right corner, that</p> <p>6 some sculptures in bronze, care of the</p> <p>7 Palema Trust or Palema administrator,</p> <p>8 to the Purple Trust, are being shipped</p> <p>9 to consignee, Monsieur Bouin in New</p> <p>10 York.</p> <p>11 What's your understanding of</p> <p>12 why Mr. Bouin was receiving property of</p> <p>13 the Purple Trust?</p> <p>14 A. I don't know. This is the</p> <p>15 first time I see this paper.</p> <p>16 MS. DONOVAN: A momentary</p> <p>17 break.</p> <p>18 THE VIDEOGRAPHER: The time</p> <p>19 is approximately 4:20 p.m.</p> <p>20 Going off the record.</p> <p>21 (Whereupon, a short break was</p> <p>22 taken at this time.)</p> <p>23 THE VIDEOGRAPHER: The time</p> <p>24 is 4:37 p.m., and we are back on</p> <p>25 the record.</p>	<p style="text-align: right;">Page 224</p> <p>1 JANNA BULLOCK</p> <p>2 the alleged upon information and</p> <p>3 belief, and as to those, I believe them</p> <p>4 to be true.</p> <p>5 A. Yes.</p> <p>6 MS. DONOVAN: At this point,</p> <p>7 I'm going to suspend the</p> <p>8 deposition.</p> <p>9 We have real concerns about</p> <p>10 the production from Ms. Bullock</p> <p>11 and frankly, her veracity and</p> <p>12 forthrightness in the proceeding.</p> <p>13 Before I formally suspend, as</p> <p>14 her counsel, do you have questions</p> <p>15 for her?</p> <p>16 MR. CUCCARO: I do. I have</p> <p>17 about 10 to 15 minutes worth of</p> <p>18 questions that I was going to ask</p> <p>19 when you are done.</p> <p>20 I understand from your</p> <p>21 representation that you are done,</p> <p>22 at least for today.</p> <p>23 MS. DONOVAN: And we'll be</p> <p>24 moving to court.</p> <p>25 MR. CUCCARO: Okay. I'd like</p>
<p style="text-align: right;">Page 223</p> <p>1 JANNA BULLOCK</p> <p>2 MS. DONOVAN: Could we please</p> <p>3 mark this as Exhibit 17, please.</p> <p>4 (Whereupon, a verified</p> <p>5 complaint was marked as Bullock</p> <p>6 Exhibit 18 for Identification.)</p> <p>7 Q. Ms. Bullock, could you please</p> <p>8 review Exhibit 17.</p> <p>9 A. Okay.</p> <p>10 Q. Ms. Bullock, do you recognize</p> <p>11 the document marked as Exhibit 18?</p> <p>12 A. Yes.</p> <p>13 Q. And this is the verified</p> <p>14 complaint, your verified complaint</p> <p>15 against the architect, Giancarlo</p> <p>16 Alhadeff?</p> <p>17 A. Mm hm.</p> <p>18 Q. Ms. Bullock, can you confirm</p> <p>19 that that's your signature at Page 10?</p> <p>20 A. Yes.</p> <p>21 Q. In which you swear that</p> <p>22 you've read the foregoing verified</p> <p>23 complaint and know the contents thereof</p> <p>24 to be true to the best of my knowledge</p> <p>25 except as to matters stated therein to</p>	<p style="text-align: right;">Page 225</p> <p>1 JANNA BULLOCK</p> <p>2 to just take a couple of minutes</p> <p>3 before I do that.</p> <p>4 But again, it should be about</p> <p>5 10, 15 minutes.</p> <p>6 THE VIDEOGRAPHER: The time</p> <p>7 is approximately 4:40 p.m., and we</p> <p>8 are going off the record.</p> <p>9 (Whereupon, a break was taken</p> <p>10 at this time.)</p> <p>11 THE VIDEOGRAPHER: The time</p> <p>12 is approximately 4:49 p.m., and</p> <p>13 we're back on the record.</p> <p>14 EXAMINATION BY</p> <p>15 MR. CUCCARO:</p> <p>16 Q. Ms. Bullock, do you</p> <p>17 understand that we're here today in</p> <p>18 connection with an action in the</p> <p>19 Southern District of New York for</p> <p>20 discovery in aid of a foreign</p> <p>21 proceeding in Cyprus?</p> <p>22 A. Yes.</p> <p>23 Q. I'd like you to ask you a few</p> <p>24 questions about the claims that have</p> <p>25 been alleged against you in that</p>

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<p style="text-align: right;">Page 226</p> <p>1 JANNA BULLOCK</p> <p>2 pending Cyprus litigation.</p> <p>3 Gazprombank alleges that it</p> <p>4 purchased bonds in 2005 and 2006 issued</p> <p>5 by the Moscow Region Mortgage Agency</p> <p>6 OAO. And I refer to that as MOAO,</p> <p>7 under that acronym, will you understand</p> <p>8 what I'm referring to?</p> <p>9 A. Yes.</p> <p>10 Q. And the Moscow Region</p> <p>11 Investment Mortgage Company, if I refer</p> <p>12 to that as MOITK, will you understand</p> <p>13 what that acronym refers to?</p> <p>14 A. Yes.</p> <p>15 Q. Prior to the commencement of</p> <p>16 the Cyprus action, were you aware that</p> <p>17 Gazprombank purchased bonds from MOAO</p> <p>18 or MOITK?</p> <p>19 A. No.</p> <p>20 Q. Prior to the commencement of</p> <p>21 the Cyprus action, were you aware that</p> <p>22 MOAO or MOITK issued bonds?</p> <p>23 A. No.</p> <p>24 Q. Did you intend that</p> <p>25 Gazprombank purchase bonds issued by</p>	<p style="text-align: right;">Page 228</p> <p>1 JANNA BULLOCK</p> <p>2 connection with its alleged bond</p> <p>3 purchases from MOAO?</p> <p>4 A. No.</p> <p>5 Q. Did you ever have any role</p> <p>6 whatsoever in the supervisory council</p> <p>7 that approved the bond issuance by</p> <p>8 MOAO?</p> <p>9 MS. DONOVAN: Objection.</p> <p>10 MR. CUCCARO: You can answer.</p> <p>11 A. No.</p> <p>12 Q. Did you ever have any role</p> <p>13 whatsoever in the bond issuance by</p> <p>14 MOITK?</p> <p>15 A. No.</p> <p>16 Q. Did you have any role</p> <p>17 whatsoever in connection with any</p> <p>18 prospectus issue by MOITK in connection</p> <p>19 with any bond offering?</p> <p>20 MS. DONOVAN: Objection.</p> <p>21 MR. CUCCARO: You can answer.</p> <p>22 A. No.</p> <p>23 Q. Did you ever make any</p> <p>24 representations to Gazprombank in</p> <p>25 connection with its alleged bond</p>
<p style="text-align: right;">Page 227</p> <p>1 JANNA BULLOCK</p> <p>2 either MOAO or MOITK?</p> <p>3 A. I didn't know anything about</p> <p>4 it.</p> <p>5 Q. Did you ever intend to</p> <p>6 personally profit from any bonds that</p> <p>7 may have been issued either by MOAO or</p> <p>8 MOITK?</p> <p>9 A. No.</p> <p>10 Q. Did you ever intend to profit</p> <p>11 indirectly through any company or trust</p> <p>12 from any bonds that may have been</p> <p>13 issued by either MOAO or MOITK?</p> <p>14 A. No.</p> <p>15 Q. Did you have any role</p> <p>16 whatsoever in the bond issuance by</p> <p>17 MOAO?</p> <p>18 A. No.</p> <p>19 Q. Did you have any role</p> <p>20 whatsoever in connection with any</p> <p>21 prospectus issued by MOAO in connection</p> <p>22 with any bond offering?</p> <p>23 A. No.</p> <p>24 Q. Did you ever make any</p> <p>25 representations to Gazprombank in</p>	<p style="text-align: right;">Page 229</p> <p>1 JANNA BULLOCK</p> <p>2 purchases from MOITK?</p> <p>3 MS. DONOVAN: Objection.</p> <p>4 A. No.</p> <p>5 Q. Did you have any role</p> <p>6 whatsoever in the supervisory council</p> <p>7 that approved the bond issuance by</p> <p>8 MOITK?</p> <p>9 MS. DONOVAN: Objection.</p> <p>10 A. No.</p> <p>11 MR. CUCCARO: Please respond</p> <p>12 audibly.</p> <p>13 Q. Did anyone act at your</p> <p>14 direction in connection with any bond</p> <p>15 issuance by MOAO?</p> <p>16 A. No.</p> <p>17 Q. Did anyone act at your</p> <p>18 direction in connection with any bond</p> <p>19 issuance by MOITK?</p> <p>20 A. No.</p> <p>21 Q. Did you ever intend to</p> <p>22 personally profit from any bonds that</p> <p>23 may have been issued by either MOAO or</p> <p>24 MOITK?</p> <p>25 MS. DONOVAN: Objection.</p>

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<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. Did you ever conspire with</p> <p>4 anyone to misappropriate the money</p> <p>5 Gazprombank allegedly invested in MOAO</p> <p>6 or MOITK?</p> <p>7 MS. DONOVAN: Objection.</p> <p>8 A. No.</p> <p>9 Q. Did you ever encourage anyone</p> <p>10 misappropriate the money Gazprombank</p> <p>11 allegedly involved in MOAO or MOITK</p> <p>12 bonds?</p> <p>13 MS. DONOVAN: Objection.</p> <p>14 A. No.</p> <p>15 Q. Did you ever assist anyone in</p> <p>16 misappropriating money Gazprombank</p> <p>17 allegedly invested in MOAO or MOITK</p> <p>18 bonds?</p> <p>19 MS. DONOVAN: Objection.</p> <p>20 A. No.</p> <p>21 Q. Are you aware of anyone who</p> <p>22 intended to misappropriate the money</p> <p>23 Gazprombank allegedly invested in MOAO</p> <p>24 or MOITK bonds?</p> <p>25 A. No.</p>	<p>1 JANNA BULLOCK</p> <p>2 A. No.</p> <p>3 Q. Did you ever control MOITK</p> <p>4 either directly or indirectly?</p> <p>5 MS. DONOVAN: Objection.</p> <p>6 A. No.</p> <p>7 Q. Did you ever control MOAO</p> <p>8 either directly or indirectly?</p> <p>9 MS. DONOVAN: Objection.</p> <p>10 A. No.</p> <p>11 Q. Gazprombank's statement of</p> <p>12 claim filed in Cyprus makes reference</p> <p>13 to an alleged bond guarantor named The</p> <p>14 Mortgage Company of the Moscow Region,</p> <p>15 OAO.</p> <p>16 If I refer to that entity as</p> <p>17 ICMO, will you understand what that</p> <p>18 acronym refers to?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. I'm going to refer to</p> <p>21 Mortgage Company of the Moscow Region</p> <p>22 OAO as ICMO.</p> <p>23 A. No. I don't know what that</p> <p>24 is.</p> <p>25 Q. Okay. Did you personally</p>
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<p>1 JANNA BULLOCK</p> <p>2 MS. DONOVAN: Objection.</p> <p>3 Q. Did you ever have an</p> <p>4 agreement with anyone to defraud MOAO</p> <p>5 or MOITK bond investors?</p> <p>6 MS. DONOVAN: Objection.</p> <p>7 A. No.</p> <p>8 Q. Did you ever have an</p> <p>9 agreement with anyone to misappropriate</p> <p>10 the proceeds of the MOAO or MOITK</p> <p>11 bonds?</p> <p>12 A. No.</p> <p>13 Q. Did you personally divert any</p> <p>14 assets of MOAO?</p> <p>15 A. No.</p> <p>16 Q. Did you ever direct any other</p> <p>17 person to divert assets from MOAO?</p> <p>18 A. No.</p> <p>19 MS. DONOVAN: Objection.</p> <p>20 Q. Did you personally divert any</p> <p>21 assets of MOITK?</p> <p>22 A. No.</p> <p>23 Q. Did you ever direct anyone</p> <p>24 other person to divert assets from</p> <p>25 MOITK?</p>	<p>1 JANNA BULLOCK</p> <p>2 divert any assets belonging to the</p> <p>3 Mortgage Company of the Moscow Region?</p> <p>4 A. No.</p> <p>5 MS. DONOVAN: Objection.</p> <p>6 Q. Did you ever direct any other</p> <p>7 person to divert assets from the</p> <p>8 Mortgage Company of the Moscow Region?</p> <p>9 MS. DONOVAN: Objection.</p> <p>10 A. No.</p> <p>11 Q. Did you ever control the</p> <p>12 mortgage company of the Moscow region?</p> <p>13 MS. DONOVAN: Objection.</p> <p>14 A. No.</p> <p>15 Q. Have you ever held a position</p> <p>16 with the government of the Moscow</p> <p>17 Region?</p> <p>18 A. No.</p> <p>19 Q. Have you ever directed the</p> <p>20 financial affairs of the government of</p> <p>21 the Moscow Region either directly or</p> <p>22 indirectly?</p> <p>23 MS. DONOVAN: Objection.</p> <p>24 A. No.</p> <p>25 Q. Have you ever held a position</p>

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1 JANNA BULLOCK
 2 as an officer or director of the
 3 Russian company, OORIG Group?
 4 A. No.
 5 MS. DONOVAN: Objection.
 6 Q. Have you ever had the
 7 authority to direct the corporate
 8 affairs of OORIG Group?
 9 A. No.
 10 MS. DONOVAN: Objection.
 11 Q. Have you ever held a position
 12 as an officer or director of the
 13 Russian company IFC RIGroup Finance
 14 ZAO?
 15 A. No.
 16 Q. Have you ever had the
 17 authority to direct the corporate
 18 affairs of RIG Group Finance?
 19 A. No.
 20 Q. Prior to the commencement of
 21 the litigation in Cyprus, were you
 22 aware that RIG Group Finance served as
 23 underwriter for any MOAO bond issuance?
 24 MS. DONOVAN: Objection.
 25 A. No.

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1 JANNA BULLOCK
 2 MS. DONOVAN: Objection.
 3 A. No.
 4 Q. Have you ever held a position
 5 as an officer or director of a Russian
 6 company OOO NEFTMASH? N-E-F-T-M-A-S-H.
 7 A. No.
 8 Q. Have you ever had the
 9 authority to direct the cooperate
 10 affairs of NEFTMASH?
 11 MS. DONOVAN: Objection.
 12 A. No.
 13 Q. Have you ever held a position
 14 as an officer or director of a Russian
 15 company OOO EDOM Invest?
 16 A. No.
 17 Q. Have you ever had the
 18 authority to direct the corporate
 19 affairs of OOO EDOM Invest?
 20 MS. DONOVAN: Objection.
 21 A. No.
 22 Q. Have you ever held a position
 23 as an officer or director of the
 24 Russian company OOO Prom Audit?
 25 A. No.

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1 JANNA BULLOCK
 2 Q. Have you ever held a position
 3 as an officer or director of the
 4 Russian bank ZAO Moscow Zola Ngovivi
 5 Bank [phonetic], which I will refer to
 6 as MZB?
 7 A. No.
 8 Q. Have you ever had the
 9 authority to direct the corporate
 10 affairs of MZB?
 11 MS. DONOVAN: Objection.
 12 A. No.
 13 Q. Prior to the commencement of
 14 the litigation in Cyprus, were you
 15 aware that MZB served as payment agent
 16 for any MOAO bond issuance?
 17 MS. DONOVAN: Objection.
 18 A. No.
 19 Q. Have you ever held a position
 20 as an officer or director of the
 21 Russian company OOO Konfael?
 22 A. No.
 23 Q. Have you ever had the
 24 authority to direct the corporate
 25 affairs of Konfael?

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1 JANNA BULLOCK
 2 MS. DONOVAN: Objection.
 3 Q. Have you ever had the
 4 authority to direct the corporate
 5 affairs of OOO Prom Audit?
 6 A. No.
 7 Q. Did you cause MOITK to breach
 8 any contract?
 9 MS. DONOVAN: Objection.
 10 A. No.
 11 Q. Did you cause MOAO to breach
 12 any contractor?
 13 MS. DONOVAN: Objection.
 14 A. No.
 15 Q. Did you cause the MOAO to
 16 breach any contract?
 17 MS. DONOVAN: Objection.
 18 A. No.
 19 Q. Did you cause the Mortgage
 20 Company of the Moscow Region OAO to
 21 breach any contract?
 22 MS. DONOVAN: Objection.
 23 A. No.
 24 Q. Did you have any role
 25 whatsoever in connection with the

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Page 238	Page 240																																														
<p>1 JANNA BULLOCK</p> <p>2 decision by MOITK to declare</p> <p>3 insolvency?</p> <p>4 MS. DONOVAN: Objection.</p> <p>5 A. No.</p> <p>6 Q. Did you have any role</p> <p>7 whatsoever in connection with the</p> <p>8 decision by MOAO to declare insolvency?</p> <p>9 MS. DONOVAN: Objection.</p> <p>10 A. No.</p> <p>11 Q. Did you have any role</p> <p>12 whatsoever in connection with the</p> <p>13 decision by the Mortgage Company of the</p> <p>14 Moscow Region OAO to declare</p> <p>15 insolvency?</p> <p>16 MS. DONOVAN: Objection.</p> <p>17 A. No.</p> <p>18 MR. CUCCARO: I have no</p> <p>19 further questions for the witness.</p> <p>20 MS. DONOVAN: So we'll</p> <p>21 suspend, and we'll go to the judge</p> <p>22 on some of the concerns I raised</p> <p>23 earlier about the production and</p> <p>24 forthrightness.</p> <p>25 MR. CUCCARO: Obviously, we</p>	<p>1 JANNA BULLOCK</p> <p>2 record.</p> <p>3 The time is 4:59 p.m. and we</p> <p>4 are back on the record.</p> <p>5 MR. CUCCARO: We are</p> <p>6 designating this transcript in its</p> <p>7 entirety as confidential under the</p> <p>8 protective order that is in place</p> <p>9 in this action.</p> <p>10 THE VIDEOGRAPHER: The time</p> <p>11 is approximately 4:59 p.m., and</p> <p>12 we're going off the record.</p> <p>13 (Whereupon, at ^ (TIME), the</p> <p>14 examination of this witness was</p> <p>15 concluded.)</p> <p>16</p> <p>17 JANNA BULLOCK</p> <p>18 Subscribed and sworn to before me</p> <p>19 this ____ day of _____ 20__.</p> <p>20</p> <p>21 NOTARY PUBLIC</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>																																														
Page 239	Page 241																																														
<p>1 JANNA BULLOCK</p> <p>2 dispute that there are any such</p> <p>3 valid, concerns.</p> <p>4 But yes, we will discuss this</p> <p>5 offline.</p> <p>6 THE VIDEOGRAPHER: This</p> <p>7 concludes Volume 1 of today's</p> <p>8 testimony for the video deposition</p> <p>9 of Ms. Janna Bullock.</p> <p>10 Today's testimony consists of</p> <p>11 four media units. The master</p> <p>12 recordings will be held in the</p> <p>13 custody of GregoryEdwards LLC,</p> <p>14 located at 400 Virginia Avenue</p> <p>15 South West, Washington, D.C.</p> <p>16 20024.</p> <p>17 The time is approximately</p> <p>18 4:59 p.m. and we are going on the</p> <p>19 record.</p> <p>20 MR. CUCCARO: I'm sorry</p> <p>21 there's one other thing I'd like</p> <p>22 to get on the record.</p> <p>23 THE VIDEOGRAPHER: Counsel</p> <p>24 has noted that there is another</p> <p>25 item he wants to put on the</p>	<p>1</p> <p>2 I N D E X</p> <table border="0"> <tr> <td>3 EXAMINATION BY</td> <td>PAGE</td> </tr> <tr> <td>4 MS. DONOVAN</td> <td>6</td> </tr> <tr> <td>5 MR. TREMONTE</td> <td>96</td> </tr> <tr> <td>6 MS. DONOVAN</td> <td>99</td> </tr> <tr> <td>7 MR. CUCCARO</td> <td>225</td> </tr> </table> <p>8 E X H I B I T S</p> <table border="0"> <tr> <td>9 DONOVAN EXHIBITS: FOR ID:</td> <td>PAGE</td> </tr> <tr> <td>10 EXHIBIT 1 subpoena</td> <td>7</td> </tr> <tr> <td>11 EXHIBIT 2 subpoena</td> <td>23</td> </tr> <tr> <td>12 EXHIBIT 3 Cyprus filings</td> <td>64</td> </tr> <tr> <td>13 EXHIBIT 4 document</td> <td>71</td> </tr> <tr> <td>14 EXHIBIT 5 order</td> <td>75</td> </tr> <tr> <td>15 EXHIBIT 6 open listing agreement</td> <td>128</td> </tr> <tr> <td>16 EXHIBIT 7 e-mail correspondence</td> <td>130</td> </tr> <tr> <td>17 EXHIBIT 8 open listing agreement</td> <td>143</td> </tr> <tr> <td>18 EXHIBIT 9 e-mail correspondence</td> <td>144</td> </tr> <tr> <td>19 EXHIBIT 10 e-mail correspondence</td> <td>152</td> </tr> <tr> <td>20 EXHIBIT 11 e-mail correspondence</td> <td>155</td> </tr> <tr> <td>21 EXHIBIT 12 February 28, 2011 e-mail</td> <td>182</td> </tr> <tr> <td>22 EXHIBIT 13 e-mail correspondence</td> <td>201</td> </tr> <tr> <td>23 EXHIBIT 14 article</td> <td>207</td> </tr> <tr> <td>24 EXHIBIT 15 e-mail correspondence</td> <td>211</td> </tr> <tr> <td>25 EXHIBIT 16 composite documents</td> <td>215</td> </tr> <tr> <td>EXHIBIT 18 verified complaint</td> <td>223</td> </tr> </table> <p>(Exhibits retained by Counsel.)</p>	3 EXAMINATION BY	PAGE	4 MS. DONOVAN	6	5 MR. TREMONTE	96	6 MS. DONOVAN	99	7 MR. CUCCARO	225	9 DONOVAN EXHIBITS: FOR ID:	PAGE	10 EXHIBIT 1 subpoena	7	11 EXHIBIT 2 subpoena	23	12 EXHIBIT 3 Cyprus filings	64	13 EXHIBIT 4 document	71	14 EXHIBIT 5 order	75	15 EXHIBIT 6 open listing agreement	128	16 EXHIBIT 7 e-mail correspondence	130	17 EXHIBIT 8 open listing agreement	143	18 EXHIBIT 9 e-mail correspondence	144	19 EXHIBIT 10 e-mail correspondence	152	20 EXHIBIT 11 e-mail correspondence	155	21 EXHIBIT 12 February 28, 2011 e-mail	182	22 EXHIBIT 13 e-mail correspondence	201	23 EXHIBIT 14 article	207	24 EXHIBIT 15 e-mail correspondence	211	25 EXHIBIT 16 composite documents	215	EXHIBIT 18 verified complaint	223
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2 CERTIFICATE

3 STATE OF NEW YORK)

:SS.:

4 COUNTY OF KINGS)

5 I, AVERY N. ARMSTRONG, a Notary Public
6 for and within the State of New York, do hereby
7 certify:

8 That the witness whose examination is
9 hereinbefore set forth was duly sworn and that
10 such examination is a true record of the testimony
11 given by that witness.

12 I further certify that I am not related
13 to any of the parties to this action by blood or
14 by marriage and that I am in no way interested in
15 the outcome of this matter.

16 IN WITNESS WHEREOF, I have hereunto set
17 my hand this 6th day of February 2018.

18

19

20 _____
AVERY N. ARMSTRONG

21

22

23

24

25